

**Bootle Area Action Plan  
Submission to Secretary of State  
Regulation 22 (1) (c)  
Statement of Consultation**

**December 2024**

## Introduction

### Purpose of document

1. This document sets out how Sefton Council has sought participation from communities and stakeholders during preparation of its Bootle Area Action Plan (AAP) in accordance with Regulations 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
2. It meets Regulation 22(1)(c) and demonstrates that consultation on the preparation of the AAP has been undertaken in accordance with the relevant Regulations and the council's [Statement of Community Involvement](#) (approved March 2018).
3. Regulation 22(1)(c) requires the submission to the Secretary of State of a statement setting out:
  1. which bodies and persons the local planning authority invited to make representations under Regulation 18;
  2. how those bodies and persons were invited to make representations under Regulation 18;
  3. a summary of the main issues raised by the representations made pursuant to Regulation 18;
  4. how any representations made pursuant to Regulation 18 have been taken into account;
  5. if representations were made pursuant to Regulation 20, the number of representations made, and a summary of the main issues raised in those representations; and
  6. if no representations were made in Regulation 20, that no such representations were made.

### Preparation of Bootle Area Action Plan

4. In the preparation of an Area Action Plan for Bootle there have been two main stages under Regulation 18:
  - Stage 1 – Issues and Options Consultation
  - Stage 2 – Preferred Options Consultation
5. For each of these stages a Consultation Report was published which includes a summary of the key issues raised.
  - [Issues and Options Consultation Report \(March 2022\)](#)
  - [Preferred Options Consultation Report \(April 2024\)](#)
6. The issues raised and Issues and Options stage were reflected upon when the detailed policies were initially drafted. Whilst not all comments and issues raised have

a planning solution, we tried to reflect these as far as possible within the vision, objectives and policies that were drafted for the Preferred Options document.

7. At Preferred Options stage the comments that were received were a lot more specific as for the first time we presented a draft vision and suite of objectives and policies. The consultation report to this stage includes a table of those comments and if the Council agreed with them and propose changes as a result.

### **Publication of Bootle AAP for representation**

8. Informed by engagement during the preparation stages and following approval at the [11<sup>th</sup> July 2024 Full Council meeting](#), the Bootle AAP was published in September 2024 for representations to be made ahead of it being submitted to the Secretary of State for independent examination.

9. If adopted, the Bootle AAP will, alongside the Sefton Local Plan and Waste Local Plan, form part of the development plan for the area.

10. It provides a positive vision for the future of the town, looking ahead to 2040. The key purposes of doing an AAP for the wider Bootle area is:

- to promote and support regeneration, growth, and investment in the wider Bootle area and to make Bootle a sustainable place to live and work;
- to provide the mechanism to secure planning approval for the various regeneration projects already underway in the area (notably plans for Bootle Strand);
- to identify other areas of regeneration opportunity in the area and articulate the types of development the Council would wish to promote in the future in these areas;
- to demonstrate to the public, landowners, businesses, the private sector, funding providers and others that the Council is supportive of and aspirational for growth and investment in the Bootle area;
- to provide specific development management policies for the Bootle area to tackle issues particularly pressing in this area;
- To show how the range of policies and development sites opportunities can contribute to a vision for the town.

### **Publicity carried out to invite representations**

11. The Bootle AAP Publication Version and other 'proposed submission documents' were published in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 on Friday 13<sup>th</sup> September 2024 with representations invited until Monday 11<sup>th</sup> November 2024, a period of eight weeks and three days. In accordance with the Statement of Community Involvement, copies of the proposed submission documents and the statement of the representation's procedure were made available for inspection at Bootle Library; Bootle Town Hall; the Planning Offices at Trinity Road, Bootle; and on the council's website.

12. A statement of the representations procedure and a statement of the fact that the proposed submission documents were available for inspection and of the places and times at which they could be inspected was sent to each of the specific and general consultation bodies invited to make representations at regulation 18(1). This was carried out as part of emails and letters sent to members of the Sefton Plan-making Consultation Database on 16<sup>th</sup> September 2024 notifying them of the publication of the Bootle AAP.

13. Representations were invited to be made using a survey form on the Council's online consultation and engagement hub. Representation Forms were also made available in Microsoft Word format to download on the council's Bootle AAP web pages so that representations could also be made via email or post.

14. A notice was placed in the Metro newspaper on 11<sup>th</sup> September 2024, a copy of which is provided at Appendix A.

15. The availability of the Bootle AAP publication document was published on the Council's social media outlets. The total 'reach'<sup>1</sup> on Facebook was 39,364. This was done over 12 posts with an average reach of 3,280. For Instagram the total reach was 5,957, with an average per post of 496.

16. It was realised, with a couple of weeks still to go during the consultation period that 10 residents, who had used the online consultation portal at Preferred Options stage, had not been emailed directly about the availability of the publication Bootle AAP. They were duly contacted and an opportunity to phone or meet an officer was given to talk through the plan. Only one resident chose to do so and largely expressed contentment with the plan in Bootle, particularly those in Bootle Town Centre. None of the others have contacted the Council either during the remaining consultation period or since.

### **Ongoing Bootle engagement**

17. The Council continue to engage on various projects in the Bootle area, and this engagement will inform various projects. These will include the various Masterplan work that the Council is committed to plus various regeneration projects. This additional engagement is particularly focused on young people and children. To assist with this work the Council have seconded a Bootle Heritage Engagement Co-ordinator to undertake this work.

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<sup>1</sup> Reach is the amount of people who viewed the post once

## Number of representations made on Local Plan Publication Version

18. A total of 64 individual representations were made by 12 respondents during the representations period. The representations received can be viewed at [www.sefton.gov.uk/BootleAAP](http://www.sefton.gov.uk/BootleAAP). The list of respondents is as follows:

<b>Respondent Number</b>	<b>Respondent Name</b>
01	David Barton
02	Historic England
03	Woodland Trust
04	National Highways
05	Natural England
06	NHS Property England
07	Home Builders Federation
08	Liverpool City Region Combined Authority
09	Sport England
10	Canal and Rivers Trust
11	United Utilities
12	Homes England

## **Main issues raised in representations to Local Plan Publication Version**

13. A summary of the main issues raised on the Bootle AAP Publication Version is set out below. These are set out in plan order and the numbers referenced identify which respondent made the comment (see above). Appendix B set out the comments made, any changes suggested by the respondents and the Council's response.

### **General**

14. Homes England (12) and Liverpool City Region Combined Authority (08) are generally supportive of the plan as a whole as they see that it aligns with their aspirations for regeneration, including that expressed in the emerging Liverpool CR Spatial Development Strategy.

### **Vision/Objectives**

15. United Utilities (11) generally supportive of the vision as it includes a reference to climate change. They also support the reference in objective 13 which requires standards in new development that help the Council respond to the challenge of climate change. They refer to linking green/blue infrastructure, surface water management and landscape design as a strategic requirement.

### **Policy BAAP1 Design**

16. David Barton (1) generally supportive of policy but would like policy to promote lower density building adjacent to canal. HBF (7) consider policy is not justified, is not effective and is not consistent with national policy as it may not be feasible to increase design quality in lower value areas and this could restrict development. Canal & Rivers Trust (10) generally supportive of policy but make some detailed comments on the draft Design Code for the area. United Utilities (11) welcome the policy but ask that it refers to sustainable drainage and mitigating sewer flood risk.

### **BAAP2 Best Use of Resources**

17. David Barton (1) generally supportive of policy but asks that it strengthened in relation to protecting older buildings from demolition. HBF (7) objects to the policy in relation to the requirements for water efficiency, and setting local standards for greenhouse gas emissions, low carbon, local heat and energy solutions as these should be done nationally and through building regulations. United Utilities (11) support the policy on water efficiency.

### **BAAP3 Bootle Central Area**

18. David Barton (1) generally supportive with points raised in relation to potential for free parking and green/blue infrastructure. National Highways (4) supportive of the proposed re-use of office space in centre as this helps keep trips local.

### **BAAP4 Bootle Town Centre**

19. David Barton (1) generally supports the policy but asks that traditional drinking establishments to be restored and introduction of traditionally designed restaurants/inns. National Highways (4) support the policy in that it will encourage localised and more sustainable trips, which in turn will likely lead to a reduction in traffic on the surrounding road network. Canal and Rivers Trust (10) supports that the policy makes reference to the canal as an important asset in the town centre. United Utilities (11) request that the site-specific policy for BAAP4 refers to sewer flood risk.

#### **BAAP5 Bootle Office Quarter**

20. David Barton (1) supports the policy but asks that any demolition of modern buildings (1950s onwards) should be replaced using traditional designs to be guided by specialist Design Codes. United Utilities (11) request that the site-specific policy for BAAP5 refers to sewer flood risk.

#### **BAAP6 Civic and Education Quarter**

21. David Barton (1) supports the policy and suggests that the buildings are used for their original purpose. United Utilities (11) request that policy outlines clear requirements for drainage.

#### **BAAP7 Local Shopping Parades**

22. David Barton (1) supports the policy and asks that the Council use a range of public events with all potential stakeholders to help regenerate these areas.

#### **BAAP8 Getting Around**

22. David Barton (1) asks that Part 1 id completely revised to consider a greater level of free car parking provision to incentivise visitors. National Highways (04) is supportive of this policy.

#### **BAAP9 Nature**

23. David Barton (1) considers the policy should require developers who don't provide BNG should provide monies to provide an off-site greenspace. He also asks that high rise buildings to be restricted. The Woodland Trust (03) refer to the need to be complaint with the NPPF in relation to the loss or deterioration of irreplaceable habitats, such as ancient woodland and ancient or veteran trees. They also recommend the Council set out how it will encourage developers to secure measurable net gains for biodiversity where development proposals have not provided Biodiversity Net Gain and how it will ensure these measures are actually delivered. The Woodland Trust support reference to wildlife corridors.

#### **BAAP10 Healthy Bootle**

24. David Barton (1) considers that additional greenspaces are needed to support better health outcomes. NHS Property Services (6) asks that the policy seeks to secure developer contributions towards meeting the healthcare infrastructure and, or mitigation needs arising from development. The HBF (7) object to the need for a Health

Impact Assessment for sites already allocated in the plan and that this only apply to proposals contrary to the plan.

### **BAAP11 Public Greenspace**

25. David Barton (1) asks that the policy is amended so that new areas of public open space are required, in part to support the climate change agenda. The Woodland Trust (03) refer to the need to be complaint with the NPPF in relation to the loss or deterioration of irreplaceable habitats, such as ancient woodland and ancient or veteran trees. They welcome the protection to open spaces in part 1 of the policy and the links between greenspaces in part 2. Sport England (09) object to Part 1 of the policy as they considered it is inconsistent with NPPF para 103.

### **BAAP12 Employment Land Provision**

26. David Barton (1) supports the policy but asks that a ‘prospectus of desired industries’ be created to encourage businesses to locate on the employment sites. United Utilities (11) ask that allocations are supported by site-specific policy which outlines clear requirements for drainage and sewer flood risk.

### **BAAP13 Protection of Employment Land**

27. David Barton (1) supports the policy but asks that a ‘prospectus of desired industries’ be created to encourage businesses to locate on the employment sites.

### **BAAP14 Limiting the Impact of Industry on Residents**

28. David Barton (1) generally supports the policy but states that it supports comments elsewhere that new areas of open spaces are required. United Utilities (11) have made comments in relation to development in proximity to their wastewater assets.

### **BAAP15 Securing Opportunities for Employment and Skills from New Development**

29. David Barton (1) generally supports the policy but has referred to the use of traditional architecture.

### **BAAP16 Housing Land Provision**

30. David Barton (1) generally supports the policy but has referred to the use of traditional architecture. HBF (7) do not consider the plan sound as it does not help the Council deliver against its overall housing need. United Utilities (11) ask that allocations are supported by site-specific policy which outlines clear requirements for drainage and sewer flood risk.

### **BAAP17 Affordable Housing and Housing Mix**

31. David Barton (1) generally supports the policy but has referred to the use of traditional architecture. HBF (7) do not agree the policy is sound as it does not take account of viability or, in the case of housing mix, flexible enough. They also object to the M4(2) and M4(3) design requirements and consider need has not been demonstrated.



### **BAAP18 Housing for Older People and Supported Homes**

32. David Barton (1) generally supports the policy but has referred to the use of traditional architecture.

### **BAAP19 Conversions to Flats and Homes in Multiple Occupation**

33. David Barton (1) generally supports the policy but has referred to the use of traditional architecture. He also asks that the Council use a range of public events with all potential stakeholders to help regenerate these areas.

### **BAAP20 Hawthorne Road/Canal Corridor Regeneration Opportunity Area**

34. David Barton (1) generally supports the policy but has referred to the use of traditional architecture. He also asks that the Council use a range of public events with all potential stakeholders to help regenerate these areas. United Utilities (11) request that any proposals for this area are underpinned by a sustainable foul and surface water management strategy and that the policy outlines clear requirements for drainage and sewer flood risk.

### **BAAP21 Bootle Village Regeneration Opportunity Area**

35. David Barton (1) considers points 1 & 2 are fine generally, however objects to points 3, 4, 5, 6, 7 & 8 on the grounds that the oldest part of Bootle faces threat of being erased and there hasn't been enough effort to scope the individuals and organisations to resolve historical long-term issues plaguing the area, such as making best use of old buildings. Objects to old features being removed and being placed elsewhere when Bootle.

### **BAAP22 Open land between Irlam Road and the Asda Store Regeneration Opportunity Area**

36. David Barton (1) objects to the loss of the open land for development.

### **BAAP23 Coffee House Bridge Regeneration Opportunity Area**

37. David Barton (1) objects to the loss of the open land for development. Sport England (9) objects to the removal of the need to secure a contribution towards planning pitches from this site (as is currently required by the Local Plan).

### **BAAP24 Environmental Improvements**

38. David Barton (1) generally supports the policy and refers to improve greenery measures and energy efficient technologies. Sport England (9) considers the policy is unclear how it relates back to the existing Local Plan policy on infrastructure. They are also unclear on the mechanism for securing contributions towards playing pitches. Canal and Rivers Trust (10) generally support the policy but would welcome the inclusions of 'blue spaces' into the wording of the policy, in addition to greenspaces. The HBF (7) considers that it is not clear what the evidence is for this policy and why it is required.

## **Section 6 Implementation and Monitoring**

39. The HBF (7) recommends that the Council include an appropriate monitoring framework which not only sets out the monitoring indicators along with the relevant policies, but also sets out the data source and where they will be reported, this should also include the targets that the Plan is hoping to achieve and actions to be taken if the targets are not met

### **Other**

40. Natural England (5) welcomes the plan, and the direct links made between a healthier natural environment and healthier communities, the support for the emerging Local Nature Recovery Strategy and Recreation Mitigation Strategy, and the inclusion of environmental improvement policies. HBF (7) sets out the council should ensure that the Plan is viable, that policies are realistic, and that the total cumulative costs of all relevant policies, including those in the Sefton Plan and its supporting documentation, will not undermine deliverability of the Plan.

41. United Utilities (11), in addition to comments above, generally would wish any development sites and proposals to take account of their assets and that the Bootle AAP contains a range of additional policies in relation to water supply, drainage and sewer capacity.

## Appendix A

### Metro Bootle AAP Publication Notice

## Public & Legal Notices



### PLANNING SERVICES

#### Bootle Area Action Plan (AAP) – Publication Draft

The Bootle AAP Publication document and other proposed submission documents are being made available for public comment in accordance with Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

Copies of the following documents will be made available for public inspection from Friday 13th September 2024 until Monday 11th November 2024:

- The Publication Draft Bootle Area Action Plan and Policy Map;
- Supporting Sustainability Appraisal/Strategic Environmental Assessment and Habitats Regulations Assessment documents;
- Evidence base reports and other supporting documents which underpin the Plan; and
- Representation forms and guidance notes.

These documents can be viewed at [www.sefton.gov.uk/BootleAAP](http://www.sefton.gov.uk/BootleAAP) or at Magdalen House, Trinity Road, Bootle (Monday to Friday 10am to 5pm).

Alternatively, a paper copy of the Publication Draft Bootle Area Action Plan, the associated Policy Map and the Representation forms and guidance notes can be viewed at:

- Bootle Library, Stanley Road Bootle (Monday to Friday 10am to 5pm, Saturday 10am to 1pm)
- Bootle Town Hall, Orford Road, Bootle (Monday to Friday 10am to 5pm)

#### Your right to request to be notified of further progress

Any representation which you submit may be accompanied by a request to be notified at a specific address of any of the following:

- The submission of the Bootle Area Action for independent examination under Section 20 of the Planning and Compulsory Purchase Act 2004;
- The date of the Examination in Public;
- The publication of the recommendations of the Planning Inspector appointed to carry out an independent examination of the AAP; and
- The adoption of the AAP.

Any written comments that you make will be available people to see and copy on request. We will blank out your signature, email address, home address and any phone numbers you provide but your name will not be blanked out. Your contact details will be provided to a Programme Officer, appointed by the Council, who will manage the Bootle AAP examination.

The personal data you provide will be used as part of the Council's statutory planning duties in relation to the Bootle AAP only. Further information on how we handle your personal data can be found at [www.sefton.gov.uk/PlanningGDPR](http://www.sefton.gov.uk/PlanningGDPR)

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## Appendix B

### Summary of Comments Made in Plan Order

Rep Number	Organisation	Section/Policy/Site	Summary of Comment	Suggested Changes (if applicable and proposed)	Council Response
11-04	United Utilities	Section 3 Vision	<p>UUW notes the proposed 'Vision' in the AAP. We welcome the reference to climate change within the vision as a key challenge to be addressed. We also welcome the amendment to Objective 13 of the AAP which refers to the need to set standards in new development that help the Council respond to the challenge of climate change. The policies of the AAP should require new development to be designed so that it is resilient to the challenges of climate change including the role of green and blue infrastructure, natural flood management techniques, avoiding flood risk locations, multi-functional sustainable drainage, and the incorporation of water supply efficiency measures.</p> <p>As the LPA will be aware, green infrastructure can help to mitigate the impacts of high temperatures, combat emissions, maintain or enhance biodiversity and reduce flood risk. Green / blue infrastructure and landscape provision play an important role in managing water close to its source. If the necessary link between green/blue infrastructure, surface water management and landscape design is outlined as a strategic requirement, it will help ensure that sustainable surface water management is at the forefront of the design process.</p>		Comments noted and welcomed. The Council considers that part 9 of policy BAAP1 and its explanation provides sufficient explicit reference to green and blue infrastructure and the links to surface water management.
01-01	David Barton	BAAP1 Design	<p>General - All strongly encouraging with a special mention for Point 10 where the introduction of detailed design codes is a huge positive step forwards and I myself would be happy to promote and support this moving forward to increase the Traditional Vernacular Architecture (TVA) strengthening Bootle's maritime history. It is great to see this backed up by Points 1, 2, 7 &amp; 8 bolstering the case for authentic and distinctive construction bringing people from all ages and backgrounds together.</p>		Comments noted and welcomed.
01-02	David Barton	BAAP1 Design	<p>Canal Corridor - All encouraging, however to preserve the natural aesthetic in Point 11 iii), heights of any new developments should be as low as possible to better promote the Canal as an economic asset, providing a relaxed ambience so that more discerning people are inclined to visit without feeling as though they are visiting a smaller city centre. This will also blend better with the original use of the canal by residents and businesses historically allowing potential tourist opportunities such as boat trips to be made more fulfilling enabling higher rates to be charged where necessary if deemed worthwhile by people willing to spend for the unique experience.</p> <p>Points 12&amp;13 are extremely encouraging.</p> <p>Points 14,15,16,17 are excellent as they encapsulate a strong grip on TVA which could be a game changing benchmark in raising Bootle's profile making it not just an alluring place to visit, but to live, work and operate a business long-term stabilising revenue for the Local Authority through hardened economic times.</p>	Point 11 iii) Heights of any new developments should be as low as possible to better promote the Canal.	Comment noted and welcomed. However, Bootle is an urban area characterised by high density development. It would be out of character and unsustainable to promote low density buildings adjacent to the canal. There are many high buildings adjacent to the canal in the locality already.
07-01	Home Builders Federation	BAAP1 Design	<p>Policy BAAP1 is not considered to be sound as it is not justified, is not effective and is not consistent with national policy for the following reasons:</p> <p>This policy states that lower development values in the area should not be used to justify lower quality design and the Council will new development as an opportunity to raise design quality in the area.</p> <p>Whilst the HBF considers that this policy is laudable. The HBF considers that the Council will need to be realistic in terms of what is possible in the area due to the viability of development. The HBF notes that the Viability Assessment has not assessed the viability implications of this policy. The HBF also notes that the Viability Assessment identifies that the 15 of the 16 typologies are not viable within the base appraisals, and that even if the market values in the area increased by 10% the majority of typologies are still not viable.</p>		Good quality design should not necessarily equate to higher costs. NPPF sets out that development that is not well designed should be refused. Many parts of Bootle have been characterised in the recent past by poor design, often infill developments, and this policy makes it clear that the Council would wish to see higher design standards for new development.

Rep Number	Organisation	Section/Policy/Site	Summary of Comment	Suggested Changes (if applicable and proposed)	Council Response
10-01	Canals and River Trust	BAAP1 Design	<p>As previously commented at the Preferred Options stage, we welcome the section related to the canal corridor under section 11 of the policy. We note and welcome the inclusion of new wording under bullet point 5 (“new development should be sited to ensure there are no detrimental impacts on the structural integrity of the canal infrastructure”) in response to our previous comments.</p> <p>Section 9 of the policy refers to development helping to mitigate and adapt to the impact of climate change. This includes ‘taking the appropriate opportunities to introduce, protect and enhance green and blue infrastructure, soft landscaping and biodiversity, and reduce surface water run-off rates and volumes and other sources of flood risk.’ We welcome the addition of section 9 in relation to the opportunities for potential improvements that may be possible along the canal corridor.</p> <p>Section 12 makes reference to the Councils design code and that development adjacent to the canal should adhere to those place making principles. We note reference to the Design Code in the list of supporting documents and that this currently appears to be in draft form. Whilst paragraph 5.13 refers to the Design Code for the Canal Corridor being available for public consultation alongside this draft plan it is not clear if this is in fact the case. We would however wish to offer the following comments and would ask to be consulted in respect of any future design coding/master planning in proximity to our waterways.</p> <ul style="list-style-type: none"> <li>• The draft design code is positive in considering not only the waterway but also the towpath and adjacent land and buildings. The document has three key design principles/themes that focus on movement, space, and form. We would suggest that the importance of nature and ecology should also be embedded within these principles in addition to being included in the design concepts:</li> <li>• The movement principle is covered within the draft design code; however, we would welcome the inclusion of reference to our recently produced ‘Towpaths for Everyone’ guide to address the management and use of the towpath. We note the draft design code document references uninterrupted pedestrian and cyclist movement. We would however wish to emphasise that whilst that our towpaths are a shared space, our towpath policy gives priority to pedestrians and highlights the need for cyclists and faster users to give extra consideration to slower users and reduce their pace.</li> <li>• The draft design code document refers to the built form throughout, with some reference to taller buildings providing a local distinctiveness. It is important that daylighting and shading is considered into the design of and new development, because these can have an impact upon the canal which is an ecological and wildlife corridor.</li> </ul>		Comments noted and welcomed. The comments on the design code for the canal side sites will be taken account of when it is finalised.

Rep Number	Organisation	Section/Policy/Site	Summary of Comment	Suggested Changes (if applicable and proposed)	Council Response
11-05	United Utilities	BAAP1 Design	<p>We welcome Policy BAAP1 however, we request that this expands on the requirements for sustainable drainage (foul and surface water) which should be intrinsically linked to the proposals for landscaping.</p> <p>Sustainable Drainage (Foul Water and Surface Water) and Landscaping</p> <p>New development should manage foul and surface water in a sustainable way in accordance with national planning policy. The sustainable management of surface water is extremely important given the need to reduce the discharge of combined sewer overflows. Paragraph 2.25 of the AAP explains that:</p> <p>‘While there may be some infiltration of surface water, Bootle has no watercourses or surface water bodies other than the canal. As a result, almost all surface water discharges to combined sewers or flows out in Combined Sewer Overflows during times of flooding.’</p> <p>Alongside the reduction in discharges from the public combined sewer, the sustainable management of We welcome Policy BAAP1 however, we request that this expands on the requirements for surface water has the added benefit of reducing flood risk. We wish to emphasise the importance of any policy, including site-specific policy, identifying requirements for the sustainable management of surface water. This includes setting out the need to follow the hierarchy of drainage options for surface water in national planning practice guidance, which clearly identifies the public combined sewer as the least preferable option for the discharge of surface water. Given the limited availability of alternatives to the public combined sewer, it is also imperative that new development seeks to slow the flow of surface water by ensuring that every effort is made to priorities multi-functional SuDS. Slowing the flow will make Bootle more resilient to the challenges of climate change by reducing flood risk and the likelihood of the combined sewer spilling into water bodies.</p> <p>The evaluation of surface water management opportunities should be undertaken early in the design process. It is imperative that the approach to design, including site analysis, is intrinsically linked to making space for water. Sustainable surface water management will be particularly important to consider in the context of the requirement for new streets to be tree lined. It is a national policy requirement that new streets are tree lined as stated in paragraph 136 within the NPPF. Public realm improvements will be brought forward as part of the regeneration proposals in Bootle, and these represent an excellent opportunity to improve surface water management. However, there is currently limited information in policy within the AAP which drives the integration of sustainable drainage with landscaping proposals and proposals for the public realm.</p> <p>UUW requests that you consider how any proposals for the public realm / landscaping that is to be created on the proposed allocations can be linked to opportunities for surface water management. We request that any landscaping and public realm improvements evaluate opportunities for surface water management to include opportunities for source control and slowing the flow of surface water through the incorporation of blue and green Infrastructure. It is preferable that the evaluation of surface water and flood risk management opportunities are undertaken at the outset of the design process. Such an approach has added benefits associated with the quality of the public realm, the enhancement of biodiversity and urban cooling.</p> <p>As outlined in ‘Building for a Healthy Life’, we request that landscaping proposals are linked to the proposals for surface water management in accordance with the ‘four pillars’ of sustainable drainage systems, i.e., water quantity, water quality, amenity and biodiversity. National policy is clear that priority should be given to multi-functional SuDS over traditional underground, tanked and piped storage systems.</p> <p>Sustainable water management, especially in the form of multi-functional SuDS, helps us adapt and respond to the challenges posed by climate change and the impact of urbanising our</p>	<p>UUW recommends the following wording for inclusion within the AAP:</p> <p>‘All applications must be supported by a strategy for foul and sustainable surface water management. The surface water strategy must be in accordance with the surface water hierarchy and must prioritise multi-functional SuDS. Applicants must identify land that ensures the delivery of multi-functional sustainable drainage in accordance with the four pillars of sustainable drainage which is integrated with the landscaped environment.</p> <p>Landscaping and public realm proposals, including proposals for tree-lined streets, must be integrated with the strategy for sustainable surface water management. This could be achieved through a variety of features including:</p> <ul style="list-style-type: none"> <li>• permeable surfacing;</li> <li>• bio retention tree pits and bio retention landscaping;</li> <li>• rain gardens;</li> <li>• soakaways and filter drainage;</li> <li>• retrofitted swales; and</li> <li>• blue/green roofs.’</li> </ul>	<p>Local Plan policy EQ8 ‘Flood risk and surface water’ still applies across the AAP area. Part 3 of this policy requires proposals to take “an integrated approach to the management of flood risk, surface water and foul drainage”. The Council considers that this remains an adequate policy framework and does not agree with the first of United Utilities’ suggestions.</p> <p>Parts 7 and 8 of policy EQ8 already set out the need, where practicable, for above ground, natural SuDS which follow the surface water hierarchy and create new habitats, and its explanation gives examples of this. Part 9 of policy BAAP1 and its explanation draw out the links between sustainable surface water management and green and blue infrastructure. All of this is considered to be in line with the National Planning Policy Framework and Planning Practice Guidance. Therefore, the Council does not agree that there is a need for policy BAAP1 to refer again to the surface water hierarchy and multi-functional SuDS.</p> <p>However, the Council accepts that while policy BAAP1 and its explanation refer to the need to reduce surface water rates and volumes by 20% (as set out in Local Plan policy EQ8), they do not emphasise the landscape/ green and blue infrastructure aspects of SuDS. Therefore, the Council proposes to add text to amend part 9 of policy BAAP 1 so that it says:</p> <p>“9. Development proposals should help mitigate and adapt to the impact of climate change including taking appropriate opportunities to introduce, protect and enhance green and blue infrastructure, soft landscaping and biodiversity, prioritise use of above ground, natural sustainable drainage system features and reduce surface water run-off rates and volumes and other sources of flood risk. [...]”.</p> <p>It is also proposed split the exiting paragraph 5.10 of explanation and to add text based on that suggested by United Utilities to the new paragraph 5.10A so that it reads:</p> <p>“5.10A This should be reflected in submitted SuDS/ Drainage Pro Forms and Site-specific Flood Risk Assessments and the overall design and layout of development, including green and blue infrastructure. Development proposals on these sites must be able to show that the provisions of Local Plan policy EQ8 ‘Flood Risk and Surface Water’ and the National Planning Policy Framework have been met, including, where reasonably practicable, securing a 20% reduction in surface water run-off rates and volumes. Above ground, natural drainage features for SuDS, landscaping, green and blue infrastructure and public realm measures could include new or retrofit permeable surfacing, bio retention tree</p>



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			<p>environment. SuDS also have wider benefits and represent an opportunity to improve the quality of urban environments by changing ‘grey’ to ‘green and blue’. They can help to create more attractive and usable spaces which help with social cohesion by connecting people, improving amenity and wellbeing, and offering opportunities for nature. In our urban environments there are often areas that can be better used to manage rainfall runoff through surface levels SuDS which can transform grey and impermeable spaces to greener, more attractive and resilient spaces appreciated by the community.</p> <p>Policy should require the design of sites to be intrinsically linked to opportunities for surface water management improvements and should ensure that opportunities for source control, slowing the flow and filtration of surface water are considered early in the design process. This could be achieved through a variety of features including:</p> <ul style="list-style-type: none"> <li>• permeable surfacing;</li> <li>• bio retention tree pits and bio retention landscaping;</li> <li>• rain gardens;</li> <li>• soakaways and filter drainage;</li> <li>• retrofitted swales; and</li> <li>• blue/green roofs.</li> </ul> <p>We recommend that you refer to the Susdrain website which includes a range of case studies that show examples of how SuDS have been implemented in the urban environment. We also request that you also consider the resilience of any planting to drought. We request that you include site-specific policies regarding the approach to drainage when allocating a site, preferably informed by a flood risk assessment / drainage strategy. We request that your site-specific policy clearly states that applicants must make space available in their proposals for multi-functional sustainable drainage. Therefore, U UW recommends the following wording for inclusion within the AAP:</p> <p>‘All applications must be supported by a strategy for foul and sustainable surface water management. The surface water strategy must be in accordance with the surface water hierarchy and must prioritise multi-functional SuDS. Applicants must identify land that ensures the delivery of multi-functional sustainable drainage in accordance with the four pillars of sustainable drainage which is integrated with the landscaped environment.</p> <p>Landscaping and public realm proposals, including proposals for tree-lined streets, must be integrated with the strategy for sustainable surface water management. This could be achieved through a variety of features including:</p> <ul style="list-style-type: none"> <li>• permeable surfacing;</li> <li>• bio retention tree pits and bio retention landscaping;</li> <li>• rain gardens;</li> <li>• soakaways and filter drainage;</li> <li>• retrofitted swales; and</li> <li>• blue/green roofs.’</li> </ul> <p>We believe that adding this clarity to policy, especially site-specific policy, helps to remove uncertainty. This clarity is critical to avoid regulatory / policy uncertainty and ensure a level playing to developers operating in a competitive setting when acquiring a site (see Sustainable drainage and new housing developments, Payne, Walker, Illman and Sharp, 2023). We strongly recommend that policy and design guidance clearly identifies the need for major developments to make space for multi-functional sustainable drainage systems. As evidenced in the aforementioned research, clarity of policy requirements will help to secure better sustainable drainage results in the final design of the development. We believe that adding this clarity to site-specific policy helps to remove uncertainty, which in turn helps to contribute to a level playing field during the land acquisition process.</p>		<p>pits / landscaping, rain gardens, soakaways and filter drainage, swales, green roofs and grey water recycling”.</p>

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			<p>Any approach to planting new trees must give due consideration to the impact on utility services noting the implications that can arise because of planting too close to utility services. This can result in root ingress, which in turn increases the risk of drainage system failure and increases flood risk. It will be important that applicants refer to our 'Standard Conditions for Works Adjacent to Pipelines' (a copy of which can be found on our website) and consult with us when implementing the delivery of landscaping proposals. The approach to any planting must have regard to the proximity to existing or proposed utility assets to ensure there is no impact on these assets such as root ingress. Trees should not be planted directly over water and wastewater assets or where excavation onto the asset would require removal of the tree.</p>		



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11-06	United Utilities	BAAP1 Design	<p>Sewer Flood Risk-</p> <p>When considering flood risk policy and the location of development, we believe it is important to highlight that the preparation of the AAP should give sufficient emphasis to all forms of flood risk. When considering potential new development sites, it is important to identify where there are existing public sewers within or near to the site, which are predicted to be at risk from flooding and/or sites where there is a record of previous flooding from the public sewer. Proposals could also be affected by overland flows from nearby off-site public sewers. Policy should be clear that existing flood risk must not be displaced and that any flood risk needs to be considered early in the design process. This can be better understood once more details become available on specific sites, for example, topographic information, which will inform where exceedance paths flow.</p> <p>‘Modelled Sewer Flood Risk</p> <p>Existing public sewers pass through and near to this site which modelling data (and / or flooding incident data) identifies as being at risk of sewer flooding. This will need careful assessment and consideration in the detailed design, masterplanning and drainage details for the site. The risk of sewer flooding could affect the developable area of the site and the detail of the design.’</p> <p>Table 2 within the Appendix to this letter sets out sites where there is a record of flooding on site / in the vicinity. Where there is a record of flooding on-site, or in the vicinity of the site, we would recommend the following wording. This could be included as additional site-specific policy or as an amendment to existing draft policy, e.g., Policy BAAP1</p> <p>‘Sewer Flooding Incidents</p> <p>There are flood incidents from the public sewer on-site / in the wider area. Applicants must engage with United Utilities to consider the detailed design of the site and drainage details. The risk of sewer flooding could affect the developable area of the site and the detail of the design.’</p> <p>We also recommend the following explanatory text in respect of sewer flood risk matters:</p> <p>‘Explanatory Text</p> <p>A range of sites have been identified as at risk of sewer flooding or in the wider vicinity of sewer flooding. In respect of these sites, the applicant must engage with United Utilities prior to any masterplanning to assess the flood risk and ensure development is not located in an area at risk of flooding from the public sewer. Applicants should consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing circumstances. Applicants must demonstrate that the proposed development would be safe and not lead to increased flood risk. Applicants should not assume that changes in levels or changes to the public sewer, including diversion, will be acceptable as such proposals could increase / displace flood risk. It may be necessary to apply the sequential approach and incorporate mitigating measures subject to the detail of the development proposal. Careful consideration will need to be given to the approach to drainage including the management of surface water; the point of connection; whether the proposal will be gravity or pumped; the proposed finished floor and ground levels; the management of exceedance paths from existing and proposed drainage systems and any appropriate mitigating measures to manage any risk of sewer surcharge.’</p> <p>It is important that the above flood risks are referenced in an update to your Strategic Flood Risk Assessment and fully understood as part of any development at the site. This reflects the Planning Practice Guidance. See Paragraph: 004 Reference ID: 7-004-20220825 where applicants and planning authorities are advised to refer to Strategic Flood Risk Assessments to identify opportunities to control the risk of flooding. We recommend that any flood risk is better</p>	<p>This could be included as additional site-specific policy or as an amendment to existing draft policy, e.g., Policy BAAP1.</p> <p>‘Modelled Sewer Flood Risk</p> <p>Existing public sewers pass through and near to this site which modelling data (and / or flooding incident data) identifies as being at risk of sewer flooding. This will need careful assessment and consideration in the detailed design, masterplanning and drainage details for the site. The risk of sewer flooding could affect the developable area of the site and the detail of the design.’</p> <p>Where there is a record of flooding on-site, or in the vicinity of the site, we would recommend the following wording. This could be included as additional site-specific policy or as an amendment to existing draft policy, e.g., Policy BAAP1</p> <p>‘Sewer Flooding Incidents</p> <p>There are flood incidents from the public sewer on-site / in the wider area. Applicants must engage with United Utilities to consider the detailed design of the site and drainage details. The risk of sewer flooding could affect the developable area of the site and the detail of the design.’</p> <p>We also recommend the following explanatory text in respect of sewer flood risk matters:</p> <p>‘Explanatory Text</p> <p>A range of sites have been identified as at risk of sewer flooding or in the wider vicinity of sewer flooding. In respect of these sites, the applicant must engage with United Utilities prior to any masterplanning to assess the flood risk and ensure development is not located in an area at risk of flooding from the public sewer. Applicants should consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing circumstances. Applicants must demonstrate that the proposed development would be safe and not lead to increased flood risk. Applicants should not assume that changes in levels or changes to the public sewer, including diversion, will be acceptable as such proposals could increase / displace flood risk. It may be necessary to apply the sequential approach and incorporate mitigating measures subject to the detail of the development proposal. Careful consideration will need to be given to the approach to drainage including the management of surface water; the point of connection; whether the proposal will be gravity or pumped; the proposed finished floor and ground levels; the management of exceedance paths from existing and proposed drainage systems and any appropriate mitigating measures to manage any risk of sewer surcharge.’</p>	<p>The Council is proposing to amend part 9 of policy BAAP1 so that would read:</p> <p>“9. Development proposals should help mitigate and adapt to the impact of climate change including taking appropriate opportunities to introduce, protect and enhance green and blue infrastructure, soft landscaping and biodiversity, <b>prioritise use of above ground, natural sustainable drainage system features</b> and reduce surface water run-off rates and volumes and other sources of flood risk. <b>Development proposals will need careful consideration of drainage, surface water, sewer and other flood risks and their management and mitigation at the detailed design, masterplanning and drainage details stages as these may affect the developable area of the site and the detail of design and layout”.</b></p> <p>The Council is also proposing changes to the explanation, splitting paragraph 5.10 into 5.10 and 5.10A so that it states:</p> <p>“5.10 Surface water <b>flood riskrun-off, and surface water; past, modelled or other</b> sewer and to a lesser extent groundwater and canal flood risk (<b>indicated in the Strategic Flood Risk Assessment</b>) are issues in certain parts of Bootle, including on <b>many some</b> housing and employment sites and Regeneration Opportunity and other areas. Development proposals for these sites will need careful consideration of these <b>drainage, surface water and other flood risk issues at each stages for the site. It should be noted that as</b> management and mitigation of these risks may affect the developable area of the sites and the detail of design and layout. <b>This includes surface water management, rates and volumes, exceedance flow paths from existing and proposed drainage systems, finished floor and ground levels; and for sewers also matters such as the point of connection, whether the proposal will be gravity or pumped, whether changes to public sewers are likely to be acceptable and mitigating measures for any sewer surcharge risks. Developers should engage with United Utilities, the Lead Local Flood Authority and where appropriate the Canal and River Trust from an early stage.</b></p> <p>5.10A This should be reflected in submitted SuDS/ Drainage Pro Forms and Site-specific Flood Risk Assessments <b>and the overall design and layout of development, including green and blue infrastructure. Development Pproposals on these sites must be able to show that the provisions of Local Plan policy EQ8 ‘Flood Risk and Surface Water’ and the National Planning Policy Framework</b> have been met, including, where reasonably practicable, securing a 20% reduction in surface water run-off rates and volumes. ....”</p> <p>The Council considers that this is an appropriate balance between United Utilities’ suggestions and the</p>

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			understood as soon as possible so that the impact on any development proposals can be confirmed.		need for the approach to flood risk and surface water to be proportionate and not over-dominant within the plan.
01-03	David Barton	BAAP2 Best Use of Resources	<p>Point 1 excellent however Old Builds should be permitted to continue functioning with improved energy efficiency measures that may not be as fully energy-efficient as preferred on the basis that existing technology, such as heat pumps would detract from their overall appearance, space conditions, etc.</p> <p>Points 3&amp;4 incur a major objection with the alternative to be to retain ALL Old Builds (period style Victorian and Edwardian with modern Pre-fab 1950s onwards being the exception) owing to their rich carbon capacity storage when compared to new builds that only retain 16% on average (English Heritage and The Guardian). This will boost the conservation programme, provide better social benefits for residents and investors overall, combat the climate crisis effectively and prevent laborious paperwork exercises for agreed demolition which is still harmful if allowed to continue. In beautifying the streetscape this will attract a stronger rapport with all social groups, especially younger people who it can be demonstrated that the Local Authority are trying to improve the Built Environment for them, thereby reducing spin-off problems such as littering and fly tipping.</p> <p>Point 5 is fine when it excludes the demolition aspect.</p>	<p>Point 1 excellent however older buildings should be permitted to continue functioning with improved energy efficiency measures that may not be as fully energy-efficient as preferred.</p> <p>Points 3&amp;4 incur a major objection with the alternative to be to retain ALL older buildings.</p> <p>Point 5 is fine when it excludes the demolition aspect.</p>	<p>The Council notes the broad support for parts 3 and 5 of policy BAAP2; broadly; for the retention of existing buildings in preference or demolition and re-build, and for submission of evidence to demonstrate evidence of best use of resources for major development.</p> <p>Part 1 of the policy refers to development, which includes new build and changes or use/ conversion. The Council considers that the use of the phrase ‘where practicable’ allows for existing buildings to continue functioning with improved energy efficiency measures that may not be as fully energy efficient as preferred, if this is the most appropriate option for that application. No changes are proposed to part 1.</p> <p>The evidence of need for the approach of parts 3 and 4 of policy BAAP2 is set out in a range of national, regional and local strategies, policies and declarations relating to the zero-carbon agenda. The Council considers its approach to embodied</p>

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					carbon, to securing efficient use of construction/ demolition resources and to reducing waste and maximising recycling is justified, clear, proportionate and effective. It is not feasible to retain every existing building or structure, but nor is it desirable to make demolition and redevelopment the 'default' position, not least because of the loss of embodied carbon, additional carbon impacts inherent to the production of construction materials and because of increased waste generally. It is considered that the Plan achieves a suitable balance. No changes are proposed to parts 3, 4 or 5.
07-02	Home Builders Federation	BAAP2 Best Use of Resources	<p>Policy BAAP2 is not considered to be sound as it is not justified, is not effective and is not consistent with national policy for the following reasons:</p> <p>This policy states that major development should incorporate measures to reduce greenhouse gas emissions where practicable. It also states that all new build housing developments should aim to be water efficient by seeking to encourage water consumption to fewer than 110 litres per person per day. It also goes on to state that evidence demonstrating the best use of resources must be submitted with all major development proposals.</p> <p>The HBF considers that it is important that the Council does not set its own standards for development which may differ from the approach being taken by national Government, and that any such policy in relation to reducing greenhouse gas emissions, low carbon, local heat and energy solutions are implemented on a flexible basis, and that the Council recognise the decarbonisation of the national grid. This would be in line with the Written Ministerial Statement of December 2023.</p> <p>Building Regulations Part L 2013 is often used as a base line for measuring future building performance in terms of carbon reduction. Part L 2021 sees a 31% reduction in carbon use when compared to that of Part L 2013, it still sees the use of gas or fossil fuel heating used in new properties. The 31% improvement is achieved through enhanced performance to the design of the building fabric and within the appliances used within the home. Part L 2025 (known as the Future Homes Standard (FHS)) is expected to see a 75% to 80% reduction in carbon use when compared to Part L 2013. Any new home built to the Part L 2025 will not utilise any form of fossil fuel heating within the home, it will only contain sources of electric heating and electrical appliances. This means that the homes built to the FHS will be 'zero carbon ready'. This in turn means that as the National Grid decarbonises, no additional work will be needed to be carried out to those properties in order for them to function as 'zero carbon homes'.</p> <p>The Building Regulations require all new dwellings to achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock. This mandatory standard represents an effective demand management measure. The Optional Technical Housing Standard is 110 litres per day per person.</p> <p>As set out in the NPPF, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned. Therefore, a policy requirement for the optional water efficiency standard</p>	The HBF considers that requirement for optional water efficiency standard is not justified nor consistent with national policy in relation to need or viability and should be deleted.	<p>Paragraph s 5.21 and 5.22 set out the Council's justification for part 2. The Council notes United Utilities' 'in principle' support for part 2, and their statement that "Evidence confirms that the optional standard for water efficiency can be achieved at no cost for new residential development (See table 3 of 'Water Ready: A report to inform HM Government's roadmap for water efficient new homes (April 2024)')" [<a href="#">see Water Ready_A report to inform HM Government-s roadmap for water efficient new homes.pdf</a>].</p> <p>The Council does not agree with the views of the HBF. No changes to part 2 are proposed as a result of this representation.</p>

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			<p>must be justified by credible and robust evidence. If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, then the Council should justify doing so by applying the criteria set out in the PPG. PPG states that where there is a 'clear local need, Local Planning Authorities (LPA) can set out Local Plan Policies requiring new dwellings to meet tighter Building Regulations optional requirement of 110 litres per person per day'. PPG also states the 'it will be for a LPA to establish a clear need based on existing sources of evidence, consultations with the local water and sewerage company, the Environment Agency and catchment partnerships and consideration of the impact on viability and housing supply of such a requirement'. The Housing Standards Review was explicit that reduced water consumption was solely applicable to water stressed areas. The North West, Sefton and Bootle are not considered to be an area of Water Stress as identified by the Environment Agency. Therefore, the HBF considers that requirement for optional water efficiency standard is not justified nor consistent with national policy in relation to need or viability and should be deleted.</p>		



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11-07	United Utilities	BAAP2 Best Use of Resources	<p>A tighter water efficiency standard in new development has multiple benefits including a reduction in water and energy use, as well as helping to reduce customer bills. Water efficiency is a key component of your journey to net zero. Evidence confirms that the optional standard for water efficiency can be achieved at no cost for new residential development (See table 3 of 'Water Ready: A report to inform HM Government's roadmap for water efficient new homes (April 2024)'). To promote sustainable development UUW offers a reduction in infrastructure charges to applicant's delivering water efficient homes and draining surface water sustainably (criteria apply). Further details can be found here-<a href="https://www.unitedutilities.com/builders-developers/your-development/planning/building-sustainable-homes/">https://www.unitedutilities.com/builders-developers/your-development/planning/building-sustainable-homes/</a></p> <p>UUW supports the principle of criterion 2 of Policy BAAP2 which states:</p> <p>'2. All new build housing developments should aim to be water efficient by seeking to encourage water consumption to fewer than 110 litres per person per day.'</p> <p>Whilst supporting the principle of this criterion, we are concerned that the aspirational nature of the wording which states 'should aim'. Noting that there is no additional cost associated with the implementation of the optional standard for water efficiency, we strongly recommend that criterion 2 is amended so that new development is required to achieve the tighter standard for water efficiency. Our amended wording is as follows.</p> <p>'2. All new residential developments must achieve, as a minimum, the optional requirement set through Building Regulations Requirement G2: Water Efficiency or any future updates.</p> <p>All major non-residential development shall incorporate water efficiency measures so that predicted per capita consumption does not exceed the levels set out in the applicable BREEAM 'Excellent' / 'Very good' standard.'</p> <p>This recommended wording will also ensure that the policy is reflective of any future change to the optional standard. It also ensures that there is a water efficiency requirement for non-residential proposals.</p> <p>We also recommend that paragraph 5.22, which relates to water efficiency, cross refers to page 78 of the Revised Draft Water Resources Management Plan 2024 for UUW which can be found <a href="https://www.unitedutilities.com/corporate/about-us/our-future-plans/water-resources/developing-our-water-resources-management-plan/">https://www.unitedutilities.com/corporate/about-us/our-future-plans/water-resources/developing-our-water-resources-management-plan/</a>. This states:</p> <p>'Based on our commitments to reduce demand for water, to support water resources resilience and reduce our impact on the environment, we are requesting that all local authorities in our supply area adopt the optional minimum building standard of 110 litres per person per day (lppd) in all new builds.'</p>		<p>The Council welcomes this 'in principle' support and evidence from United Utilities submitted as part of their representations at Publication Draft and Preferred Options stages. This reinforces the Council's belief that this approach is justified for the reasons set out in paragraphs 5.21 and 5.22 of the explanation.</p> <p>However, the Council accepts that the current wording of the policy which seeks to 'encourage', rather than 'require' water efficiency is imprecise and does not give applicants or decision-makers sufficient certainty. It does not achieve the aims set out in the previous paragraph. Therefore, the Council proposes a change to the wording of part 2 of policy BAAP2 so that it says:</p> <p><b><i>"2. All new build housing developments <del>should aim to be water efficient by seeking to encourage water consumption to fewer than must achieve, as a minimum, the optional requirement of 110 litres per person per day</del> set through Building Regulations Requirement G2: Water Efficiency."</i></b></p> <p>While it is accepted that 110 litres per person per day is the current option requirement set through Building Regulations Requirement G2: Water Efficiency, at the current time the Council does not wish to 'future proof' the policy as suggested by United Utilities. That is, the Council does not agree to replacing the reference to 110 litres per person per day simply by a reference to the 'optional standard or any future updates'. The Council would want time to monitor and assess aspects of the implementation of this new water efficiency approach/standard before committing to more restrictive future limits. This monitoring and assessment would inform the approach in any future review of Bootle Area Action Plan and/or the Local Plan.</p>

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01-04	David Barton	BAAP3 Bootle Central Area	<p>All points extremely encouraging with a special mention for Points 2,3&amp;4. Point 2 iv, v, vi, vii) are key proposals that I have been actively striving for and are welcomed greatly by many grassroots and prospective investment sources alike. The Bootle Town Hall Complex as a visitor/education visitor centre would be a brilliant initiative enabling people to fulfil their potential through traditional academic and vocational qualifications alike. Interconnecting these areas will help pupils and volunteers even acquire better accessibility to resources that could benefit them and the local economy for the long-term through retention of localised skill sets and a resurgence in particular industries, such as luxury car making. The use of green and blue infrastructure will serve as a magnet for wider investment from both public and private sector sources enabling better promotion of the entirety of Bootle in turn.</p> <p>Point 3- Free Car Parking provision must be actively explored to grow the economy and visitation leading to longer-term investment opportunities in vacant units, etc.</p> <p>Point 4 must be fully exercised to get to grips with some of the underlying issues plaguing both the Local Authority and the local communities present across Bootle and Sefton.</p>		Points noted and welcomed. Charging regimes for parking is not a planning matter.
04-01	National Highways	BAAP3 Bootle Central Area	National Highways' primary focus is on ensuring the continued safe operation of the Strategic Road Network (SRN). Although highway works are often the method in which mitigation for development is delivered, other more sustainable measures should be considered ahead of road improvements. Importantly, land uses should be appropriate for sites within the Plan and, where possible, suitability should be judged at least partly on the ability to use, enhance or develop forms of sustainable travel.		Noted and welcomed.
01-05	David Barton	BAAP4 Bootle Town Centre	<p>All points very encouraging, especially Point 3 prioritising Traditional Retail enabling Bootle to retain its shopping identity and encouraging others across the Borough to persevere.</p> <p>Sub-Sections all fine, however the introduction of new drinking establishments should be monitored with a focus on restoring historic Public Houses and integration of traditional style restaurant inns to create a friendly atmosphere that may actively and positively make people consider using these places more frequently and hosting business events to invest in the area beyond holding meetings for work away from home, etc.</p> <p>A special mention for Bootle Strand Shopping Centre which has been well-put together by a dedicated team of professionals listening to and acting on feedback being presented to them.</p>		Point noted and welcomed.
04-02	National Highways	BAAP4 Bootle Town Centre	BAAP4 looks to masterplan the redevelopment of Bootle town centre, providing local facilities and an enhanced public space. This improved sense of place further encourages localised and more sustainable trips, which in turn will likely lead to a reduction in traffic on the surrounding road network.		Noted and welcomed.
10-02	Canals and River Trust	BAAP4 Bootle Town Centre	BAAP4 includes the Bootle Strand site which incorporates the canal corridor (as shown in figure 6). We welcome under section 9 that the canal is recognised as an important asset to Bootle Centre Area and note that development should have regard to Policy BAAP1 (Design) part 10 — 12, which specifically relates to the canal corridor.		Noted and welcomed.

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11-08	United Utilities	BAAP4 Bootle Town Centre	<p>In accordance with the enclosed Tables 1 and 2, we request that the site-specific policy for BAAP4 refers to sewer flood risk using the wording recommended under the heading of Sewer Flood Risk above.</p> <p>We request that policy outlines clear requirements for drainage in accordance with the policy wording which we have recommended under the heading of Sustainable Drainage (Foul Water and Surface Water) and Landscaping.</p> <p>In this regard, the opportunity to discharge to an alternative body to the public combined sewer must be considered early in the design process. In particular, the option presented by the adjacent Leeds Liverpool Canal should be explored. We recommend that the sustainable drainage strategy for the site is given early consideration as part of the development of any masterplan for the site. Therefore, early engagement with the Canals and Rivers Trust is required. As noted above, new landscaping will have a critical role to play in the management of surface water.</p> <p>There are some significant assets that pass through the Strand Shopping Centre. Applicants must not assume that these can be diverted or built over. Early engagement with UUU on these assets must occur so that the implications for development and construction can be understood.</p>	<p>Sustainable Drainage and Landscaping- UUU recommends the following wording for inclusion within the AAP:</p> <p>‘All applications must be supported by a strategy for foul and sustainable surface water management. The surface water strategy must be in accordance with the surface water hierarchy and must prioritise multi-functional SuDS. Applicants must identify land that ensures the delivery of multi-functional sustainable drainage in accordance with the four pillars of sustainable drainage which is integrated with the landscaped environment.</p> <p>Landscaping and public realm proposals, including proposals for tree-lined streets, must be integrated with the strategy for sustainable surface water management. This could be achieved through a variety of features including:</p> <ul style="list-style-type: none"> <li>• permeable surfacing;</li> <li>• bio retention tree pits and bio retention landscaping;</li> <li>• rain gardens;</li> <li>• soakaways and filter drainage;</li> <li>• retrofitted swales; and</li> <li>• blue/green roofs.’</li> </ul> <p>Sewer Flood Risk- These could be included as additional site-specific policy or as an amendment to existing draft policy, e.g., Policy BAAP1</p> <p>‘Modelled Sewer Flood Risk</p> <p>Existing public sewers pass through and near to this site which modelling data (and / or flooding incident data) identifies as being at risk of sewer flooding. This will need careful assessment and consideration in the detailed design, masterplanning and drainage details for the site. The risk of sewer flooding could affect the developable area of the site and the detail of the design.’</p> <p>and</p> <p>‘Sewer Flooding Incidents</p> <p>There are flood incidents from the public sewer on-site / in the wider area. Applicants must engage with United Utilities to consider the detailed design of the site and drainage details. The risk of sewer flooding could affect the developable area of the site and the detail of the design.’</p> <p>UU We also recommend the following explanatory text in respect of sewer flood risk matters:</p> <p>‘Explanatory Text</p> <p>A range of sites have been identified as at risk of sewer flooding or in the wider vicinity of sewer flooding. In respect of these sites,</p>	<p>The Council considers that its proposed changes to part 9 of policy BAAP1 and its explanation (see above) remove the need for these issues to be repeated by being referred to in policy BAAP4.</p> <p>The reference to the Canal and River Trust at the end of the amended paragraph 5.10 to say “... <b>Developers should engage with United Utilities, the Lead Local Flood Authority and where appropriate the Canal and River Trust from an early stage</b>” was added partly to take account of this United Utilities representation.</p> <p>No changes proposed to policy BAAP4 as a result of this representation.</p>

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				the applicant must engage with United Utilities prior to any masterplanning to assess the flood risk and ensure development is not located in an area at risk of flooding from the public sewer. Applicants should consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing circumstances. Applicants must demonstrate that the proposed development would be safe and not lead to increased flood risk. Applicants should not assume that changes in levels or changes to the public sewer, including diversion, will be acceptable as such proposals could increase / displace flood risk. It may be necessary to apply the sequential approach and incorporate mitigating measures subject to the detail of the development proposal. Careful consideration will need to be given to the approach to drainage including the management of surface water; the point of connection; whether the proposal will be gravity or pumped; the proposed finished floor and ground levels; the management of exceedance paths from existing and proposed drainage systems and any appropriate mitigating measures to manage any risk of sewer surcharge.'	
01-06	David Barton	BAAP5 Bootle Office Quarter	All points very good, especially Point 3 concerning preserving the South Sefton Magistrates Court Building, however as before and throughout this consultation any demolition of modern buildings (1950s onwards) should be replaced using TVA designs to be gained from specialist Design Codes. The Placemaking Principles I myself suggested in 2021 can and should be actively considered across here and other areas to enable variety and effective use of space to prevent saturation of any one type of sector/ market be this retail and/ or office use.		Point noted and welcomed.
11-09	United Utilities	BAAP5 Bootle Office Quarter	<p>In accordance with the enclosed Tables 1 and 2, we request that the site-specific policy for BAAP5 refers to sewer flood risk using the wording recommended under the heading of Sewer Flood Risk above.</p> <p>We request that policy outlines clear requirements for drainage in accordance with the policy wording which we have recommended under the heading of Sustainable Drainage (Foul Water and Surface Water) and Landscaping.</p> <p>There are some significant assets that pass through this area. Applicants must not assume that these can be diverted or built over. Early engagement with UJW on these assets must occur so that the implications for development and construction can be understood.</p>	<p>Sustainable Drainage and Landscaping- UJW recommends the following wording for inclusion within the AAP:</p> <p>'All applications must be supported by a strategy for foul and sustainable surface water management. The surface water strategy must be in accordance with the surface water hierarchy and must prioritise multi-functional SuDS. Applicants must identify land that ensures the delivery of multi-functional sustainable drainage in accordance with the four pillars of sustainable drainage which is integrated with the landscaped environment.</p> <p>Landscaping and public realm proposals, including proposals for tree-lined streets, must be integrated with the strategy for sustainable surface water management. This could be achieved through a variety of features including:</p> <ul style="list-style-type: none"> <li>• permeable surfacing;</li> <li>• bio retention tree pits and bio retention landscaping;</li> <li>• rain gardens;</li> <li>• soakaways and filter drainage;</li> <li>• retrofitted swales; and</li> <li>• blue/green roofs.'</li> </ul> <p>Sewer Flood Risk- These could be included as additional site-specific policy or as an amendment to existing draft policy, e.g., Policy BAAP1</p> <p>'Modelled Sewer Flood Risk</p>	<p>The Council considers that its proposed changes to part 9 of policy BAAP1 and its explanation (see above) remove the need for these issues to be repeated by being referred to in policy BAAP5.</p> <p>No changes proposed to policy BAAP5 as a result of this representation.</p>



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				<p>Existing public sewers pass through and near to this site which modelling data (and / or flooding incident data) identifies as being at risk of sewer flooding. This will need careful assessment and consideration in the detailed design, masterplanning and drainage details for the site. The risk of sewer flooding could affect the developable area of the site and the detail of the design.'</p> <p>and</p> <p>'Sewer Flooding Incidents</p> <p>There are flood incidents from the public sewer on-site / in the wider area. Applicants must engage with United Utilities to consider the detailed design of the site and drainage details. The risk of sewer flooding could affect the developable area of the site and the detail of the design.'</p> <p>UU We also recommend the following explanatory text in respect of sewer flood risk matters:</p> <p>'Explanatory Text</p> <p>A range of sites have been identified as at risk of sewer flooding or in the wider vicinity of sewer flooding. In respect of these sites, the applicant must engage with United Utilities prior to any masterplanning to assess the flood risk and ensure development is not located in an area at risk of flooding from the public sewer. Applicants should consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing circumstances. Applicants must demonstrate that the proposed development would be safe and not lead to increased flood risk. Applicants should not assume that changes in levels or changes to the public sewer, including diversion, will be acceptable as such proposals could increase / displace flood risk. It may be necessary to apply the sequential approach and incorporate mitigating measures subject to the detail of the development proposal. Careful consideration will need to be given to the approach to drainage including the management of surface water; the point of connection; whether the proposal will be gravity or pumped; the proposed finished floor and ground levels; the management of exceedance paths from existing and proposed drainage systems and any appropriate mitigating measures to manage any risk of sewer surcharge.'</p>	
01-07	David Barton	BAAP6 Civic and Education Quarter	<p>All points are thoroughly excellent, and I am pleased that my own original proposals for the Bootle Town Hall Complex as an Education/ Visitor Centre now appear more possible to happen when I first proposed these back in 2021. All effort should be made to bring back the former use of the civic buildings, notably the Library &amp; Museum; Public Baths; Police Station &amp; Courts and Post Office albeit in a smaller capacity to begin with combined with the educational and visitor centre concept interwoven to increase overall use of the premises in the modern day. The Placemaking Principles I myself suggested in 2021 can and should be actively considered across here and other areas to enable variety and effective use of space to prevent saturation of any one type of sector/ market be this retail and/ or civic and education use.</p>		<p>Whilst we would look to secure some public municipal uses within a regenerated complex, it is unlikely that the original uses of the buildings will be replicated. Bootle has more modern buildings for its magistrate's court, library, police station and swimming pool.</p>

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11-10	United Utilities	BAAP6 Civic and Education Quarter	<p>We request that policy outlines clear requirements for drainage in accordance with the policy wording which we have recommended under the heading of Sustainable Drainage (Foul Water and Surface Water) and Landscaping.</p> <p>In accordance with the enclosed Tables 1 and 2, we request that the site-specific policy for BAAP6 refers to sewer flood risk using the wording recommended under the heading of Sewer Flood Risk above.</p> <p>There are some significant assets that pass through this area. Applicants must not assume that these can be diverted or built over. Early engagement with UUW on these assets must occur so that the implications for development and construction can be understood.</p>	<p>Sustainable Drainage and Landscaping- UUW recommends the following wording for inclusion within the AAP:</p> <p>‘All applications must be supported by a strategy for foul and sustainable surface water management. The surface water strategy must be in accordance with the surface water hierarchy and must prioritise multi-functional SuDS. Applicants must identify land that ensures the delivery of multi-functional sustainable drainage in accordance with the four pillars of sustainable drainage which is integrated with the landscaped environment.</p> <p>Landscaping and public realm proposals, including proposals for tree-lined streets, must be integrated with the strategy for sustainable surface water management. This could be achieved through a variety of features including:</p> <ul style="list-style-type: none"> <li>• permeable surfacing;</li> <li>• bio retention tree pits and bio retention landscaping;</li> <li>• rain gardens;</li> <li>• soakaways and filter drainage;</li> <li>• retrofitted swales; and</li> <li>• blue/green roofs.’</li> </ul> <p>Sewer Flood Risk- These could be included as additional site-specific policy or as an amendment to existing draft policy, e.g., Policy BAAP1</p> <p>‘Modelled Sewer Flood Risk</p> <p>Existing public sewers pass through and near to this site which modelling data (and / or flooding incident data) identifies as being at risk of sewer flooding. This will need careful assessment and consideration in the detailed design, masterplanning and drainage details for the site. The risk of sewer flooding could affect the developable area of the site and the detail of the design.’</p> <p>and</p> <p>‘Sewer Flooding Incidents</p> <p>There are flood incidents from the public sewer on-site / in the wider area. Applicants must engage with United Utilities to consider the detailed design of the site and drainage details. The risk of sewer flooding could affect the developable area of the site and the detail of the design.’</p> <p>UU We also recommend the following explanatory text in respect of sewer flood risk matters:</p> <p>‘Explanatory Text</p> <p>A range of sites have been identified as at risk of sewer flooding or in the wider vicinity of sewer flooding. In respect of these sites,</p>	<p>The Council considers that its proposed changes to part 9 of policy BAAP1 and its explanation (see above) remove the need for these issues to be repeated by being referred to in policy BAAP6.</p> <p>No changes proposed to policy BAAP6 as a result of this representation.</p>

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				the applicant must engage with United Utilities prior to any masterplanning to assess the flood risk and ensure development is not located in an area at risk of flooding from the public sewer. Applicants should consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing circumstances. Applicants must demonstrate that the proposed development would be safe and not lead to increased flood risk. Applicants should not assume that changes in levels or changes to the public sewer, including diversion, will be acceptable as such proposals could increase / displace flood risk. It may be necessary to apply the sequential approach and incorporate mitigating measures subject to the detail of the development proposal. Careful consideration will need to be given to the approach to drainage including the management of surface water; the point of connection; whether the proposal will be gravity or pumped; the proposed finished floor and ground levels; the management of exceedance paths from existing and proposed drainage systems and any appropriate mitigating measures to manage any risk of sewer surcharge.'	
01-08	David Barton	BAAP7 Local Shopping Parades	All points are very good, however scope for exploring problematic areas- be these historically poorly managed, maintained or vacated should engage a plethora of public events with ALL and any potential stakeholders beyond the Local Authority and landowners that would maximise the chances at regenerating these areas, ensuring quality outcomes for everyone, reduce potential long-term challenges between the Public and Private Sectors and reduces obstacles towards securing grant funding and 3rd party private investment where areas of inconvenience can be actively addressed and resolved with material action much sooner than 2020 and indeed 2035 and 2040.		Point noted.
01-09	David Barton	BAAP8 Getting Around	<p>These points are overall ok, however Point1 iii&amp;vii) should be completely revised to consider a greater level of free car parking provision to incentivise anyone from part-time visitors to business and in time transformative investors that may have initially part-time visited to take a longer-term stakehold in the area. Whether we want to accept it or not- it is these people that can and will shake up the economic potential of this area and improve livelihoods for everyone in this part of the Borough so we must cater for their interests. In time as electric car technology progresses phased free car parking for electric vehicles when they become mainstream here as well as nationally could be considered.</p> <p>Point2 ii, iii&amp;iv) require in-keeping TVA signage with the addition of mass-scale tree planting and greenery insertion, especially hedgerows until such time new greenspaces can be identified. It may be that contaminated areas requiring costly cleansing or those that are potentially too hazardous may be converted to entire greenspaces if this can be authorised safely and/or needs isolating from the public if still too unsafe to be traversing for some time to come.</p>	<p>Point1 iii&amp;vii) should be completely revised to consider a greater level of free car parking provision to incentivise anyone from part-time visitors to business and in time transformative investors that may have initially part-time visited to take a longer-term stakehold in the area.</p> <p>Point 3 ii, iii&amp;iv) require in-keeping TVA signage with the addition of mass-scale tree planting and greenery insertion, especially hedgerows until such time new greenspaces can be identified.</p>	<p>Point noted.</p> <p>Parking charging regimes are not a planning matter.</p>
04-03	National Highways	BAAP8 Getting Around	BAAP8 discusses the need for new developments to adhere to the principles of active and sustainable travel, with the protection and enhancement of essential services and facilities to reduce the need to travel by car. This is a key policy to assist in minimising reliance on private vehicle use for short trips, reducing congestion and improving air quality. National Highways is supportive of this policy, which aligns with our own as outlined in the Circular.		Noted and welcomed.

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01-10	David Barton	BAAP9 Nature	<p>These points are mainly fine, however Point 2 requires revision to ensure that if planning situations truly cannot introduce Biodiversity net Gain or Greenery to that individual case, then a concerted effort by that builder/applicant and others may be pooled to use ring-fenced funding to create a new greenspace- be it a former one that was built over for modern buildings now left vacant/derelict and/ or contaminated land that requires a deep cleansing. High-rise projects should be stopped to retain the skyline and enable the benefits of the scarce greenspaces already available to be better appreciated and enjoyed alongside the attractive vistas that could lend for filming opportunities boosting the tourism economy in turn.</p>	<p>Point 2 requires revision to ensure that if planning situations truly cannot introduce Biodiversity net Gain or Greenery to that individual case, then a concerted effort by that builder/applicant and others may be pooled to use ring-fenced funding to create a new greenspace.</p> <p>High-rise projects should be stopped to retain the skyline and enable the benefits of the scarce greenspaces already available.</p>	<p>Do not agree that part 2 needs revising as it only applies to proposals that would not be liable for BNG. Bootle is an urban area characterised by high density development and we should not restrict tall buildings as a matter of principle.</p>
03-01	The Woodland Trust	BAAP9 Nature	<p>The AAP must ensure it is compliant with paragraph 186c of the National Planning Policy Framework (NPPF), which states that any development that results in the loss or deterioration of irreplaceable habitats, such as ancient woodland and ancient or veteran trees, should be refused. We consider that any policy is not legally compliant or sound unless areas of ancient woodland are excluded from development sites, with appropriate buffers specified, and reserve the right to oppose this policy if it later becomes apparent that unmapped ancient woodland is present within the site boundary.</p> <p>We would also recommend the Council set out how it will encourage developers to secure measurable net gains for biodiversity where development proposals have not provided Biodiversity Net Gain and how it will ensure these measures are actually delivered.</p> <p>We welcome that the plan includes a direction for developers to take opportunities to create and improve wildlife corridors and to connect existing and new areas of biodiversity value.</p>	<p>Specify ancient woodland are excluded from development sites, with appropriate buffers.</p> <p>Set out in the document developers to secure measurable net gains for biodiversity where development proposals have not provided Biodiversity Net Gain and measures of deliverability.</p>	<p>There are no ancient woodlands in Bootle AAP area, which is a densely built-up urban area dating almost entirely from the late 19<sup>th</sup> Century. There are very few woodlands at all, with some small areas of Woodland Priority Habitat in the Victorian Derby Park and even smaller areas elsewhere. It is almost impossible that these would be designated as ancient woodlands for the foreseeable future.</p> <p>Regarding part 2 of the policy and its explanation, it is considered that the approach to measurement will be more subjective and site-specific than the approach set out in Defra's Metrics which for example emphasise existing habitat type. Bootle has such (relatively) low nature value that measures which may seem unremarkable elsewhere may achieve "measurable" uplift in Bootle. The aim is to bring new naturalistic areas and nature into the densely built-up urban area. This would include nature gains provided as part of wider green and blue infrastructure such as shrubs, trees and planting as part of landscaping, wildflower areas, new trees or various types of sustainable drainage systems. Also, it may include measures to benefit protected or priority species such as hedgehogs or bats, or birds, for example by providing hedgehog friendly fencing, and bat or bird boxes.</p> <p>It is not considered appropriate to include such potentially detailed information about measures, deliverability or monitoring in the Area Action Plan. Instead, it should be included in the revised Nature Supplementary Planning Document which is currently being prepared, and/or in a future Information Note for example in relation to SuDS, nature / green and blue infrastructure or policy BAAP24 Environmental Improvements.</p> <p>The Local Nature Recovery Strategy (LNRS) for the LCR is still being prepared, and therefore it is not considered appropriate to refer to specific LNRS actions, measures or opportunity areas in the policy or its explanation.</p> <p>No changes proposed to policy BAAP9 or its explanation as a result of this representation.</p>

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01-11	David Barton	BAAP10 Healthy Bootle	All brilliant points, however there is a pressing need to create new greenspaces, especially regarding Point 1x) where there are already a number of Poor Quality Air Zones that besides affecting communities may be actually prohibiting the Local Authority from fulfilling its full grant funding opportunities to improve its infrastructure, such as flooding defences which in turn are compounding the very first problems described here.	Pressing need to create new greenspaces (assumed to be to Part 1(i))	<p>Sefton Council has long considered that priority should be given to enhancement of existing parks and open spaces, and accessibility to them, rather than to provision of new public greenspaces, even on previously contaminated land, as there is broadly good parks accessibility throughout Sefton's urban areas. The AAP reflects this. As set out in the Environment and Climate Change Topic Paper, this is justified by evidence of current public greenspace provision in Bootle, including the higher rates of provision of main parks than the rest of Sefton and Bootle's relatively good parks accessibility to parks. (See also the Topic Paper and comments re representations on BAAP11 and BAAP24 below).</p> <p>There are no ancient woodlands in Bootle AAP area, which is a densely built- up urban area dating almost entirely from the late 19th Century. There are very few woodlands at all, with some small areas of Woodland Priority Habitat in the Victorian Derby Park and even smaller areas elsewhere. It is almost impossible that these would be designated as ancient woodlands for the foreseeable future.</p>
06-01	NHS Property Services	BAAP10 Healthy Bootle	<p>We note that the Bootle Area Action Plan will form part of a suite of policy documents for Sefton Council once adopted. We are concerned however that at present, the Action Plan does not refer to securing developer contributions towards healthcare infrastructure, and therefore there is a policy vacuum on this matter.</p> <p>We acknowledge that there is a policy in the Area Action Plan dedicated to health at Policy BAAP10 Healthy Bootle. The policy as currently worded is comprehensive and covers a range of land uses that have a bearing on health and wellbeing. The policy also provides a requirement for Health Impact Assessments for developments over 30 dwellings, which provides a process to consider health at the planning application stage.</p> <p>Notwithstanding these positive aspects, part viii) of the AAP is not effective at present the policy is opaque and omits any reference to the role of developer contributions in healthcare infrastructure provision. Healthcare infrastructure should be delivered alongside new development, especially for primary healthcare services as these are the most directly impacted by population growth associated with new development.</p> <p>We therefore propose the following modification to ensure that the AAP is effective and consistent with national planning policy (NPPF paragraph 55) in mitigating the impacts of development where otherwise unacceptable development would result:</p> <p>Amend Policy BAAP10 part viii) to:</p> <p>viii. Supporting in principle the provision of public health facilities (subject to other BAAP and Local Plan policies) and securing developer contributions towards meeting the healthcare infrastructure and, or mitigation needs arising from development.</p> <p>It should be stated that the delivery of new and improved healthcare infrastructure is significantly resource intensive. The NHS as a whole is facing significant constraints in terms of the funding needed to deliver healthcare services, and population growth from new housing development adds further pressure to the system. New development should make a proportionate contribution to funding the healthcare needs arising from new development. Health provision is an integral</p>	<p>Amend Policy BAAP10 part viii) to:</p> <p>viii. Supporting in principle the provision of public health facilities (subject to other BAAP and Local Plan policies) and securing developer contributions towards meeting the healthcare infrastructure and, or mitigation needs arising from development.</p>	<p>There has been no evidence submitted to the Council, either through plan making or planning proposals, which has suggested that there is a need for new gps in Bootle. Bootle has had a declining population in recent decades, and it retains a good provision of gp and health surgeries (see Infrastructure Topic Paper). Many of the housing sites in the Bootle AAP already have planning permission and no developer contributions for GPs were deemed necessary when approving those. However, if through a future proposal in Bootle for a large number of housing it can be demonstrated that developer contributions are necessary towards local GP provision, this can be secured. It does not need to be specified in this policy. However, it is considered unlikely that the level of housing able to be built Bootle would create more than a limited demand for GPs and that this could be accommodated within the existing health accommodation.</p>



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			<p>component of sustainable development - access to essential healthcare services promotes good health outcomes and supports the overall social and economic wellbeing of an area.</p> <p>It is important to acknowledge that Sefton forms part of the wider Liverpool City Region Combined Authority area. Policy LCR DP9 Part a) of the emerging Spatial Development Strategy sets out the principle of securing developer contributions towards infrastructure, which once adopted will apply across the region and therefore planning guidance at the local authority level will be required to implement this overarching policy.</p> <p>NHS Property Services are working in conjunction with the Cheshire and Merseyside Integrated Care Board (ICB) to develop a consistent approach to developer contributions and emerging planning policies across the region. We would welcome the opportunity to work together to develop policy guidance to better support healthcare infrastructure provision and in securing developer contributions. This is critical given that the Sefton Council do not have a Community Infrastructure Levy in place or plans to introduce one. Further to this, background research indicates that the Council historically have not obtained S106 contributions towards healthcare. Therefore, developing a stronger policy basis across a range of policy documents would be beneficial in facilitating this in the future.</p>		

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07-03	Home Builders Federation	BAAP10 Healthy Bootle	<p>Policy BAAP10 is not considered to be sound as it is not justified, is not effective and is not consistent with national policy for the following reasons:</p> <p>This policy states that development proposals of 30+ dwellings must be accompanied by a Health Impact Assessment.</p> <p>The HBF generally supports plans that set out how the Council will achieve improvements in health and well-being. In preparing its local plan and this area action plan the Council should normally consider the health impacts with regard to the level and location of development. Collectively the policies in the plan should ensure health benefits and limit any negative impacts and as such any development that is in accordance with that plan should already be contributing positively to the overall healthy objectives of that area.</p> <p>The PPG sets out that HIAs are ‘a useful tool to use where there are expected to be significant impacts’ but it also outlines the importance of the local plan in considering the wider health issues in an area and ensuring policies respond to these. As such Local Plans should already have considered the impact of development on the health and well-being of their communities and set out policies to address any concerns. Consequently, where a development is in line with policies in the local plan a HIA should not be necessary. Only where there is a departure from the plan should the Council consider requiring a HIA. In addition, the HBF considers that any requirement for a HIA should be based on a proportionate level of detail in relation the scale and type of development proposed. The requirement for HIA for developments of 30 or more dwellings without any specific evidence that an individual scheme is likely to have a significant impact upon the health and wellbeing of the local population is not justified by reference to the PPG. Only if a significant adverse impact on health and wellbeing is identified should a HIA be required, which sets out measures to substantially mitigate the impact.</p> <p>Therefore, the HBF recommend that this policy is amended to state that ‘where development proposals depart from the Plan and are likely to have a significant impact on the health and wellbeing of the local population they should be accompanied by a Health Impact Assessment. This should include an analysis of how the above requirements, and any other potential health impacts, have been addressed within the proposal’.</p>	<p>The HBF recommend that this policy is amended to state that ‘where development proposals depart from the Plan and are likely to have a significant impact on the health and wellbeing of the local population, they should be accompanied by a Health Impact Assessment. This should include an analysis of how the above requirements, and any other potential health impacts, have been addressed within the proposal’.</p>	<p>Whilst the Council agree that health considerations are embedded in the plan making process, the level of detail at plan making and individual proposals is different. It is acknowledged that development on allocated sites for the specified use would be unlikely to create unhealthy places, but the aim of the HIA is to maximise benefits and for the applicant to demonstrate that. The Council will publish a guide for developers on HIA for proposals. It is not intended that HIAs will be onerous and could well be addressed within a Design and Access Statement if it accords with the AAP.</p>
01-12	David Barton	BAAP11 Public Greenspace	<p>Points 1&amp;2 are excellent and well outlined. Points 3&amp;4 incur objections namely for the fact that Sefton Council has an overarching commitment to its Climate Agenda it pledged to address and resolve back in 2019 which is scheduled to materialise by 2030. The climatic benefits of greenspaces will greatly enhance this core objective and even before the Climate Agenda was established as a flagship policy there was always a need to improve, increase and restore the level of greenspace that has been dramatically reduced since Bootle's inception as a settlement originally. This would also go a long way towards impressing scholars monitoring areas globally, such as Bootle whereupon the AAP in fact originated from by demonstrating shrewd resourcefulness and leadership worthy of further aid ad support beyond grant funding, such as external investment from abroad that may fuel employment, education, restorative and many more possibilities not even being countenanced presently.</p>	<p>Amend part 3 to require new developments to secure new areas of public open space.</p>	<p>There are already many policies responding to the challenge of climate change in the AAP (see Environment and Climate Change Topic Paper, BAAP1, BAAP2, BAAP8, BAAP9, BAAP11, BAAP24 etc) and the Sefton Local Plan (see EQ8 'Flood risk and surface water'). Sefton Council has long considered that priority should be given to enhancement of existing parks and open spaces, and accessibility to them, rather than to provision of new public greenspaces, even on previously contaminated land, as there is broadly good parks accessibility throughout Sefton's urban areas. The AAP reflects this. As set out in the Environment and Climate Change Topic Paper, this is justified by evidence of current public greenspace provision in Bootle, including the higher rates of provision of main parks than the rest of Sefton and Bootle's relatively good parks accessibility to parks.</p> <p>There are also more practical considerations/ evidence such as the Council's effective shortage of funding over recent years to maintain existing public greenspaces, let alone new public greenspaces. As a rule of thumb Sefton Council is not in a position to adopt new public</p>

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					<p>greenspace. An alternative is for developers to use management companies for on-going management and maintenance of public open space provided as part of new development. This relies on on-going contributions from occupiers/owners to these costs, for the lifetime of development. This alternative approach is not without its challenges.</p> <p>While the Council fully supports on-site biodiversity enhancements and the provision of green and blue infrastructure, including landscaping, trees and sustainable drainage systems within sites, as part of achieving good design and meeting policy requirements, the creation of new, largescale public greenspace is not considered appropriate in the plan area.</p> <p>No changes are proposed to this policy or is explanation.</p>
03-02	Woodland Trust	BAAP11 Public Greenspace	<p>The AAP must ensure it is compliant with paragraph 186c of the National Planning Policy Framework (NPPF), which states that any development that results in the loss or deterioration of irreplaceable habitats, such as ancient woodland and ancient or veteran trees, should be refused. We consider that any policy is not legally compliant or sound unless areas of ancient woodland are excluded from development sites, with appropriate buffers specified, and reserve the right to oppose this policy if it later becomes apparent that unmapped ancient woodland is present within the site boundary.</p> <p>We welcome that all public green spaces will be protected from new development except for where the development is necessary to enable the site to be continued to be used, or where the development is for alternative sports and recreational provision where the benefits clearly outweigh the loss of the current or former use. In these circumstances, however, this must not include the felling of or the encroachment upon existing trees in these public green spaces.</p> <p>The Trust also welcomes the commitment to improving access to and links between public green spaces.</p>	<p>Specify ancient woodland are excluded from development sites, with appropriate buffers.</p> <p>Allow for new development on public green spaces where the development is necessary for the site to continue being used, or where the development is for alternative sport and recreational provision where the benefits clearly outweigh the loss of the current/former use. This must not include the felling or encroachment upon existing trees within the public green space.</p>	<p>There are no irreplaceable habitats, ancient woodlands or ancient and veteran trees in Bootle which is a densely built-up urban area dating almost entirely from the late 19<sup>th</sup> Century.</p> <p>The Council welcomes the support for parts 1 and 2 of policy 11.</p> <p>Part 7 of Local Plan policy EQ9 'Provision of public open space, strategic paths and trees' requires any trees lost as a result of development to be replaced on a 1:1 basis and BAAP policies including BAAP9 seek to protect existing trees. As the vast majority of the public greenspaces in the plan area are managed by the Council tree protection is simpler to achieve.</p>



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09-01	Sport England	BAAP11 Public Greenspace	<p>Draft policy BAAP11 is considered inconsistent with the NPPF paragraph 103.</p> <p>Part 1 of draft policy BAAP11 sets out the AAPs approach to protecting “existing public green spaces”, outlining two circumstances where this may be considered acceptable. The comparable national policy approach is set out under paragraph 103 of the NPPF. This sets out three circumstances where the loss of existing open space, sports and recreational buildings and land, including playing fields, may be considered acceptable. The circumstances outlined under the AAP policy are not considered to be in accordance with those included under the NPPF.</p> <p>The first circumstance included under part 1 of draft policy BAAP11 is for “development necessary of the continued use and improvement of the site for its existing use” and the second circumstance is for “development for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use”. There is no conflict with the NPPF in respect of the second circumstance as the wording matches that used for the third circumstance (paragraph 103 c) of the NPPF.</p> <p>The first circumstance covered under draft policy BAAP11 is not included under paragraph 103. The concern is that the proposed wording is relatively vague (“development necessary of the continued use and improvement of the site for its existing use”) and could be used to justify the development of an ancillary use which could result in the loss of playing field. For example, it could be used to justify the extension of a pavilion, car parking, shops, cafes, onto playing field. The circumstances included under Paragraph 103 are deliberately restrictive to prevent this type of scenario. The draft wording would conflict with Sport England’s approach to consideration of planning applications affecting playing fields (see our Playing Fields Policy and Guidance document) which has been written in accordance with the circumstances set out under paragraph 103. This document sets out five exceptions where development on playing field would be considered acceptable. As set out, these have been written in accordance with the NPPF. Exception 2 of the document covers where development of ancillary facilities would be acceptable: “The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches of otherwise adversely affect their use”. This wording would be considered more appropriate – and would allow for limited development of ancillary facilities if these were considered necessary.</p> <p>The final issue with the existing wording is that the circumstances covered under NPPF 103a (relating to surplus) and 103 b (relating to alternate provision) have not been included under the policy. The justification text provided under 5.117 is noted, as is the currently up to date evidence base provided by the Sefton Playing Pitch and Open Space Strategy (PPOSS 2023). Although the Council have identified at paragraph 5.117 that it “can demonstrate there is no surplus provision or that no suitable compensatory provision can be provided in the local area...”, it is important that the evidence base is kept up to date. As set out in the current Playing Pitch Strategy Guidance document, Sport England would consider the PPS to be out of date if no review and update has been carried out within three years of the PPS being adopted (see step 10). The draft AAP will cover the period up until 2040. Although it is accurate to say there isn’t a current surplus, this isn’t to say this will remain the case throughout the entire plan period. There is therefore concern that this approach will not futureproof the policy in respect of the importance of maintaining an up to date evidence base. The same argument applies to not including an exception for 103 b (alternative provision).</p>	<p>Protecting Existing Public Green Spaces</p> <p>1. All existing public green spaces in the area identified on the policy map, will be protected from new development except for:</p> <ul style="list-style-type: none"> <li>• ancillary facilities which support the principal use of the site as a playing field, and do not affect the quantity or quality of playing pitches of otherwise adversely affect their use; or</li> <li>• where an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</li> <li>• if the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</li> <li>• development for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.</li> </ul> <p>Delete the line • development necessary for the continued use and improvement of the site for its existing use, or</p>	<p>The Council considers that it is not generally appropriate for the plan simply to replicate the National Planning Policy Framework, which is already part of the policy framework for making decisions on planning applications or at appeal. There seems to be no purpose or added value in this. Instead, the Council considers that local plan (including Area Action Plan) policy should set local requirements based on local evidence and need. The Council wishes to protect all of the public greenspaces (including pitch sites) in the plan area from development other than that set out in part 1 of policy BAAP11.</p> <p>As such, there are no sites identified within the plan area considered to be suitable for such replacement provision for pitches, parks or other public greenspaces, and the Council does not consider that replacement provision outside the plan area would represent equivalent or better provision.</p> <p>Also, the Council considers the wording to the first bullet point to be acceptable. In relation to the impact on pitches and any future shortfalls, only five of the public greenspaces are publicly available pitch sites; 4 in Council ownership.</p> <p>Further context and justification are set out in the Environment and Climate Change Topic Paper.</p> <p>No changes proposed to this policy or its explanation.</p>
01-13	David Barton	BAAP12 Employment Land Provision	<p>These points are all fine, however I would suggest a prospectus of desired industries be produced to entice people to invest here using my 2021 Placemaking Principles Guide and the Role of the Traditional Town Articles to support effective new investment happening sooner. These resources may also assist with previous policy points regarding Town Centre, Education, Housing &amp; Office Quarters.</p>	<p>Suggest a prospectus of desired industries be produced to entice people to invest. (assumed to be required under 'delivery' section).</p>	<p>Point noted. Sefton's investment team do a lot to engage with and attract business investment to Bootle.</p>

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11-11	United Utilities	BAAP12 Employment Land Provision	<p>We request that these allocations are supported by site-specific policy which outlines clear requirements for drainage in accordance with the policy wording which we have recommended under the heading of Sustainable Drainage (Foul Water and Surface Water) and Landscaping.</p> <p>In accordance with the enclosed Tables 1 and 2, we request site-specific policies for BE1, BE2, BE3, BE5, BE7, BE8 and BE9, which specifically refer to the sewer flood risk using the wording recommended under the heading of Sewer Flood Risk above.</p> <p>There are some significant assets that pass through the employment land allocations. Applicants must not assume that these can be diverted or built over. Early engagement with U UW on these assets must occur so that the implications for development and construction can be understood.</p>	<p>Sustainable Drainage and Landscaping- U UW recommends the following wording for inclusion within the AAP:</p> <p>‘All applications must be supported by a strategy for foul and sustainable surface water management. The surface water strategy must be in accordance with the surface water hierarchy and must prioritise multi-functional SuDS. Applicants must identify land that ensures the delivery of multi-functional sustainable drainage in accordance with the four pillars of sustainable drainage which is integrated with the landscaped environment.</p> <p>Landscaping and public realm proposals, including proposals for tree-lined streets, must be integrated with the strategy for sustainable surface water management. This could be achieved through a variety of features including:</p> <ul style="list-style-type: none"> <li>• permeable surfacing;</li> <li>• bio retention tree pits and bio retention landscaping;</li> <li>• rain gardens;</li> <li>• soakaways and filter drainage;</li> <li>• retrofitted swales; and</li> <li>• blue/green roofs.’</li> </ul> <p>Sewer Flood Risk- These could be included as additional site-specific policy or as an amendment to existing draft policy, e.g., Policy BAAP1</p> <p>‘Modelled Sewer Flood Risk</p> <p>Existing public sewers pass through and near to this site which modelling data (and / or flooding incident data) identifies as being at risk of sewer flooding. This will need careful assessment and consideration in the detailed design, masterplanning and drainage details for the site. The risk of sewer flooding could affect the developable area of the site and the detail of the design.’</p> <p>and</p> <p>‘Sewer Flooding Incidents</p> <p>There are flood incidents from the public sewer on-site / in the wider area. Applicants must engage with United Utilities to consider the detailed design of the site and drainage details. The risk of sewer flooding could affect the developable area of the site and the detail of the design.’</p> <p>UU We also recommend the following explanatory text in respect of sewer flood risk matters:</p> <p>‘Explanatory Text</p> <p>A range of sites have been identified as at risk of sewer flooding or in the wider vicinity of sewer flooding. In respect of these sites,</p>	<p>The Council considers that its proposed changes to part 9 of policy BAAP1 and its explanation (see above) remove the need for these issues to be repeated by being referred to in policy BAAP12. The reference to the Canal and River Trust at the end of the amended paragraph 5.10 to say “... Developers should engage with United Utilities, the Lead Local Flood Authority and where appropriate the Canal and River Trust from an early stage” was added partly to take account of this United Utilities representation. No changes proposed to policy BAAP12 or its explanation as a result of this representation.</p>

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				the applicant must engage with United Utilities prior to any masterplanning to assess the flood risk and ensure development is not located in an area at risk of flooding from the public sewer. Applicants should consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing circumstances. Applicants must demonstrate that the proposed development would be safe and not lead to increased flood risk. Applicants should not assume that changes in levels or changes to the public sewer, including diversion, will be acceptable as such proposals could increase / displace flood risk. It may be necessary to apply the sequential approach and incorporate mitigating measures subject to the detail of the development proposal. Careful consideration will need to be given to the approach to drainage including the management of surface water; the point of connection; whether the proposal will be gravity or pumped; the proposed finished floor and ground levels; the management of exceedance paths from existing and proposed drainage systems and any appropriate mitigating measures to manage any risk of sewer surcharge.'	
01-14	David Barton	BAAP13 Protection of Employment Land	These points are all fine, however I would suggest a prospectus of desired industries be produced to entice people to invest here using my 2021 Placemaking Principles Guide and the Role of the Traditional Town Articles to support effective new investment happening sooner. These resources may also assist with previous policy points regarding Town Centre, Education, Housing & Office Quarters.	Prospectus of desired industries be produced to entice people to invest.	Point noted.
01-15	David Barton	BAAP14 Limiting the Impact of Industry on Residents	These points are all fine, however this strengthens my case for a pressing need for NEW Greenspaces in and across Bootle. There are also ways beyond tree planting which should be prioritised along all arterial routes to begin with anyway plus the planting of hedgerows and enticement for landowners to introduce greenery at their homes where a partial/ full removal of a driveway for greenery including a lawn, etc may be reflected in rates and long-term tariff discounts that would in turn motivate others to take up this venture if its brought down their overall every day and annual living costs.	Ways beyond tree planting should be prioritised along all arterial routes to begin with anyway plus the planting of hedgerows and enticement for landowners to introduce greenery at their homes	<p>As set out in its response to representations on policy BAAP10 and BAAP11, Sefton Council has long considered that priority should be given to enhancement of existing parks and open spaces, and accessibility to them, rather than to provision of new public greenspaces, even on previously-contaminated land, as there is broadly good parks accessibility throughout Sefton's urban areas. The AAP reflects this. As set out in the Environment and Climate Change Topic Paper, this is justified by evidence of current public greenspace provision in Bootle, including the higher rates of provision of main parks than the rest of Sefton and Bootle's relatively good parks accessibility to parks.</p> <p>Policy BAAP8 identifies Priority Routes and part 3 says that "more trees and other planting in appropriate areas" is a priority on these routes. Part 9 of policy BAAP1 Design and other policies such as BAAP4, BAAP9, BAAP14, and especially BAAP24 also support public realm and landscaping enhancements including tree planting. Priority projects for environmental improvement identified in BAAP24 may well include tree and hedgerow planting on Priority Routes (see also the Environment and Climate Change Topic Paper).</p> <p>These AAP policies listed above and parts 7 of Local Plan policies EQ8 'Flood risk and surface water' and EQ9 'Provision of public open space, strategic paths and trees' also require above ground SuDS with natural features where practicable, and on-site planting, landscaping green and blue infrastructure.</p>

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					No changes proposed to policy or its explanation.
11-15	United Utilities	BAAP14 Limiting the Impact of Industry on Residents	<p>Development near to Wastewater Treatment Works and Pumping Stations-</p> <p>At the current time, we have not identified any issues associated with the proximity to our wastewater assets. That said, we would wish to confirm the position relating to any wastewater assets and any associated proximity concerns once we have had an opportunity to review the allocations based on the aforementioned GIS shp files which we have requested.</p> <p>1. Wastewater assets such as treatment works and pumping stations are key infrastructure for the borough which may need to expand in the future to meet growth needs or respond to new environmental drivers. Maintaining a space around a treatment works is therefore desirable to respond to any future investment requirements.</p> <p>2. As a waste management facility, a wastewater pumping station / treatment works is an industrial operation which can result in emissions. These emissions include odour and noise. A wastewater treatment works can also attract flies. A wastewater treatment works is also subject to vehicle movements from large tankers which need to access the site.</p> <p>The position of UJW is that when considering a range of sites to meet development needs, it is more appropriate to identify new development sites, especially sensitive uses, which are not close to a wastewater treatment works / pumping station. This position is in line with the 'agent of change' principle set out at paragraph 193 of the NPPF. Importantly, sensitive uses are not restricted to residential. They can include a range of other uses such as offices, schools and retail.</p> <p>In this context we wish to note the 3rd bullet point of Policy BAAP14. We request that this is amended to be less prescriptive. The nature of uses that could be affected by the agent of change principle is not restricted to residential uses. For example, an office, retail or leisure use that is proposed next to a wastewater management operation may not be acceptable due to concerns over odour. This is reflective of 'Guidance on the assessment of odour for planning' (Version 1.1. July 2018) produced by the Institute of Air Quality Management. Our amended wording for the 3rd bullet point is set out below:</p> <p>'3. Where new development is proposed adjacent or close to an existing use or activity which could have potential adverse effects, then it is the responsibility of the applicant of the proposed development (as the 'agent of change') to undertake the relevant impact assessments and provide suitable mitigation to ensure there will be no significant adverse impacts on future residents or occupiers.'</p>	<p>Amend BAAP 14, bullet point 3 to:</p> <p>'3. Where new development is proposed adjacent or close to an existing use or activity which could have potential adverse effects, then it is the responsibility of the applicant of the proposed development (as the 'agent of change') to undertake the relevant impact assessments and provide suitable mitigation to ensure there will be no significant adverse impacts on future residents or occupiers.'</p>	<p>It should be noted that United Utilities state that <i>"at the current time, we have not identified any issues associated with the proximity to our wastewater assets"</i>. The Council considers that as the agent of change issue is set out in the National Planning Policy Framework, and Sefton's Local Plan policies EQ4 and EQ5 also provide a framework, it is not appropriate to amend part 3 of policy BAAP14. More information is set out in the Environment and Climate Change Topic Paper. It is considered that the policy approach to control of pollution including air quality set out in Local Plan policies EQ4 and EQ5 and Bootle Area Action Plan policies BAAP1, BAAP10 and BAAP14 provides a sufficiently robust planning policy framework for the control of pollution in the Plan area, and no changes to policy BAAP14 or its explanation are proposed.</p>
01-16	David Barton	BAAP15 Securing Opportunities for Employment and Skills from New Development	<p>These points are fine in general, but as before should TVA principles be adopted this will support all parties and improve all outcomes ranging from beautification, carbon capacity of the built environment, pride in the area and retention of people and skills long-term in this part of the world.</p>		Point noted.
01-17	David Barton	BAAP16 Housing Land Provision	<p>In general, these points are fine BUT only if TVA Principles are adopted. Hawthorne Road is a prime example where modular New Build Housing detracts from the overall area and negates the Climate Emergency through the poor use of low carbon-storage materials which couples to the poor aesthetic. That in turn simply makes younger people think that the Local Authority is pushing profit with builders over the community hence cultural mindset of littering and fly tipping, etc owing to lack of respect for officials themselves seemingly let the area go down in quality.</p>	TVA principles to be adopted.	This policy sets out where housing will be appropriate, it does not set out design considerations.



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07-04	Home Builders Federation	BAAP16 Housing Land Provision	<p>Policy BAAP16 is not considered to be sound as it is not positively prepared and not justified, for the following reasons:</p> <p>This policy suggests that the area within the Bootle Area Action plan is estimated to contribute approximately 1,500 dwellings between 2024 and 2040 to Sefton's housing supply.</p> <p>The HBF is keen that the Council produces a plan which can help the Council to deliver against its overall housing requirement. To do this it is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the Plan period. The HBF and our members can provide valuable advice on issues of housing delivery and would be keen to work proactively with the Council on this issue.</p> <p>The Plan's policies should ensure the availability of a sufficient supply of deliverable and developable land to deliver Sefton and Bootle's housing requirement, with an appropriate mix of housing to meet their needs. This sufficiency of housing land supply (HLS) should meet the housing requirement, ensure the maintenance of a 5 Year Housing Land Supply (YHLS), and achieve Housing Delivery Test (HDT) performance measurements.</p>	Produce a plan which can help the Council to deliver against its overall housing requirement	Whilst the AAP identifies suitable sites for housing, unlike a Local Plan, it does not have an identified housing target to achieve. The Council's housing requirement is set out by the Government's Standard Methodology. This is for the whole of Sefton and is not sub-divided by settlement. Nonetheless, the Council are supportive of housing in Bootle and see this as part of its regeneration ambitions. The AAP has allocated or suitable sites for housing and has additionally provided a flexible approach to regeneration opportunity areas to allow for a mix of uses, including housing. The Site Selection Technical paper sets out how sites were chosen for their preferred uses. It was clear when embarking on the AAP (and the previous Local Plan) that Bootle does not have a surplus of available land that would significantly boost Sefton's overall housing supply, but those the town do have, have a significant regeneration focus. Nonetheless, the homes that are built in Bootle will continue to make an important contribution to the supply and choice of new homes.
11-12	United Utilities	BAAP16 Housing Land Provision	<p>We request that these allocations are supported by site-specific policy which outlines clear requirements for drainage in accordance with the policy wording which we have recommended under the heading of Sustainable Drainage (Foul Water and Surface Water) and Landscaping.</p> <p>In accordance with the enclosed Tables 1 and 2, we request a site-specific policy for BH1 specifically refers to on-site sewer flood risk using the wording recommended under the heading of Sewer Flood Risk.</p> <p>There are some significant assets that pass through the housing land allocations. Applicants must not assume that these can be diverted or built over. Early engagement with Uuw on these assets must occur so that the implications for development and construction can be understood.</p>	<p>Sustainable Drainage and Landscaping- Uuw recommends the following wording for inclusion within the AAP:</p> <p>'All applications must be supported by a strategy for foul and sustainable surface water management. The surface water strategy must be in accordance with the surface water hierarchy and must prioritise multi-functional SuDS. Applicants must identify land that ensures the delivery of multi-functional sustainable drainage in accordance with the four pillars of sustainable drainage which is integrated with the landscaped environment.</p> <p>Landscaping and public realm proposals, including proposals for tree-lined streets, must be integrated with the strategy for sustainable surface water management. This could be achieved through a variety of features including:</p> <ul style="list-style-type: none"> <li>• permeable surfacing;</li> <li>• bio retention tree pits and bio retention landscaping;</li> <li>• rain gardens;</li> <li>• soakaways and filter drainage;</li> <li>• retrofitted swales; and</li> <li>• blue/green roofs.'</li> </ul> <p>Sewer Flood Risk- These could be included as additional site-specific policy or as an amendment to existing draft policy, e.g., Policy BAAP1</p> <p>'Modelled Sewer Flood Risk</p> <p>Existing public sewers pass through and near to this site which modelling data (and / or flooding incident data) identifies as being at risk of sewer flooding. This will need careful assessment</p>	The Council considers that its proposed changes to part 9 of policy BAAP1 and its explanation (see above) remove the need for these issues to be repeated by being referred to in policy BAAP16. The reference to the Canal and River Trust at the end of the amended paragraph 5.10 to say "... Developers should engage with United Utilities, the Lead Local Flood Authority and where appropriate the Canal and River Trust from an early stage" was added partly to take account of this United Utilities representation. No changes proposed to policy BAAP16 or its explanation as a result of this representation.

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				<p>and consideration in the detailed design, masterplanning and drainage details for the site. The risk of sewer flooding could affect the developable area of the site and the detail of the design.'</p> <p>and</p> <p>'Sewer Flooding Incidents</p> <p>There are flood incidents from the public sewer on-site / in the wider area. Applicants must engage with United Utilities to consider the detailed design of the site and drainage details. The risk of sewer flooding could affect the developable area of the site and the detail of the design.'</p> <p>UU We also recommend the following explanatory text in respect of sewer flood risk matters:</p> <p>'Explanatory Text</p> <p>A range of sites have been identified as at risk of sewer flooding or in the wider vicinity of sewer flooding. In respect of these sites, the applicant must engage with United Utilities prior to any masterplanning to assess the flood risk and ensure development is not located in an area at risk of flooding from the public sewer. Applicants should consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing circumstances. Applicants must demonstrate that the proposed development would be safe and not lead to increased flood risk. Applicants should not assume that changes in levels or changes to the public sewer, including diversion, will be acceptable as such proposals could increase / displace flood risk. It may be necessary to apply the sequential approach and incorporate mitigating measures subject to the detail of the development proposal. Careful consideration will need to be given to the approach to drainage including the management of surface water; the point of connection; whether the proposal will be gravity or pumped; the proposed finished floor and ground levels; the management of exceedance paths from existing and proposed drainage systems and any appropriate mitigating measures to manage any risk of sewer surcharge.'</p>	
01-18	David Barton	BAAP17 Affordable Housing and Housing Mix	In theory these points are fine BT only if TVA Principle are adopted. In agreeance with the Local Authority for those individuals and families seeking to become more aspirational it would be preferable to provide attractive family-sized style homes of a beautiful design that will bring with them good everyday living habits that will dampen any pre-existing issues encountered by anyone across Bootle- be it Sefton council or the residents and businesses themselves. Modern brutalist and in the moment new style Self and Custom Build houses should be blocked as Bootle should clearly demonstrate its commitment to showcasing its maritime heritage and more importantly maritime future potential with the Freeport status opportunities that could boost employment and education facets.	TVA principles to be adopted.	This policy sets out where affordable housing will be secured, it does not set out design considerations.

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07-05	Home Builders Federation	BAAP17 Affordable Housing and Housing Mix	<p>Policy BAAP17 is not considered to be sound as it is not justified, is not effective and is not consistent with national policy for the following reasons:</p> <p>This policy states that housing developments that provide 15 dwellings or more should provide a minimum of 15% of the homes as affordable. It suggests that the affordable housing tenure should be 33% as affordable or social rent, 25% as First Homes and 42% as affordable home ownership.</p> <p>The HBF supports the need to address the affordable housing requirements of the borough. The NPPF is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability and deliverability. The Viability Assessment clearly identifies the viability issues within Bootle with only one of the 16 typologies assessed determined to be viable. There is limited improvement to the viability of development even when the market values are increased by 10%. The Council should be mindful that it is unrealistic to negotiate every site on a one-by-one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery. The HBF considers that the evidence provided by the Council does not support the 15% affordable housing requirement, and that this should be amended and / or applied on a much more flexible basis.</p> <p>In relation to the housing mix on schemes that provide 25% new build homes or more of any tenure the Council expect the housing mix for market housing to be a minimum of 25% 1- or 2-bedroom properties; 40% 3-bed properties. Whilst for affordable housing the mix should be 25% 1-bed properties; a minimum of 60% 1 or 2 bed properties; and a minimum of 85% 1, 2 or 3 bed properties.</p> <p>The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to overly prescriptive requirements, requiring a mix that does not consider the scale of the site or the need to provide significant amounts of additional evidence. The HBF would expect the Council to ensure that the policy is applied flexibly, and makes allowance for home builders to provide alternative housing mixes as is required by the market.</p> <p>Part 10 of the policy states that all new homes should be designed to meet the M4(2) standards, unless site specific factors such as vulnerability to flooding, site topography, and other circumstances make a site unsuitable. Whilst Part 11 goes on to state that on schemes of 50 or more dwellings a minimum of 5% of the homes should be designed to meet the M4(3) standard.</p> <p>The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG. The PPG identifies the type of evidence required to introduce a policy requiring the M4 standards, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for Sefton &amp; Bootle which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Area Action Plan policy. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommends that an appropriate transition period is included within the policy.</p> <p>The Council should also note that the Government response to the Raising accessibility standards for new homes states that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. This will be subject to a further consultation on the technical details and will be</p>	<p>The HBF considers that the evidence provided by the Council does not support the 15% affordable housing requirement, and that this should be amended and / or applied on a much more flexible basis.</p> <p>The HBF would expect the Council to ensure that the housing mix policy is applied flexibly, and makes allowance for home builders to provide alternative housing mixes as is required by the market.</p> <p>Council to provide the appropriate evidence for M4 standards and this policy is to be included, then the HBF recommends that an appropriate transition period is included within the policy.</p> <p>The HBF would recommend appropriate evidence is collated to identify the need for self and custom housing. . The HBF considers that policy mechanisms could be used to ensure a reliable and sufficient provision of self &amp; custom build opportunities across the area including allocation of small and medium scale sites specifically for self &amp; custom build housing and permitting self &amp; custom build outside but adjacent to settlement boundaries on sustainable sites especially if the proposal would round off the developed form.</p>	<p>The Council recognises that viability can be a challenge in the Bootle area. However, the viability assessment has shown that it doesn't take much of an improvement in the local prices to make many development typologies to be able to support planning obligations in the local area. We have a similar approach to affordable housing in the Local Plan, and since adoption we have only had two schemes that have had to submit viability assessments in the Bootle AAP to reduce obligations, and only one of these (former St Wilfrid's School site) to reduce affordable housing. Whilst we do not wish to frustrate development and regeneration in the Bootle area, we would be negligent if we fail to secure benefits on these schemes that can support some obligations. The Council consider the policy position allows sufficient flexibility to deal with viability challenges and the Council have retained viability consultant who is reasonably priced and responsive to requests for assessments, so the occasions that a viability assessment is required, the process is quick and easy.</p> <p>The Council considers it has embedded flexibility into its housing mix policy. For market homes, the majority of homes (75%) can be of 3 or more bedrooms. Even the smaller homes the applicant can choose to provide 1 or 2 bedroom homes to meet local need.</p> <p>The evidence for M4(2) is set out in the 2019 SHMA and summarised in the Housing Topic Paper.</p>

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			<p>implemented in due course through the Building Regulations. M4(3) would continue to apply as now where there is a local planning policy is in place and where a need has been identified and evidenced.</p> <p>The HBF considers that if the Council has the evidence to introduce this policy, it may want to consider the most appropriate way to deliver the homes they require to meet their needs. The HBF considers that this may not always be in the form of M4(3) homes, and may need further consideration.</p> <p>Self and Custom Build Homes-</p> <p>This policy also states that on schemes of 100 new build dwellings or more the Council will encourage developers to provide a small number of serviced plots up to 2% of the total housing capacity for custom or self-build homes. It suggests that these could be in lieu of on-site affordable homes.</p> <p>The HBF would recommend appropriate evidence is collated to identify the need for self and custom housing and to ensure that house building delivery from this source provides an additional contribution to boosting housing supply. This is likely to include engaging with landowners and working with self and custom build and -community-led developers to maximise opportunities. The PPG sets out how custom and self-build housing needs can be assessed.</p> <p>The PPG also sets out how local authorities can increase the number of planning permissions which are suitable for self and custom build housing. These include supporting neighbourhood planning groups to include sites in their plans, effective joint working, using Council owned land and working with Home England. The HBF considers that policy mechanisms could be used to ensure a reliable and sufficient provision of self &amp; custom build opportunities across the area including allocation of small and medium scale sites specifically for self &amp; custom build housing and permitting self &amp; custom build outside but adjacent to settlement boundaries on sustainable sites especially if the proposal would round off the developed form.</p>		
01-19	David Barton	BAAP18 Housing for Older People and Supported Homes	In general, these points are fine BUT only if TVA Principles are adopted.	TVA principles to be adopted.	This policy sets out where housing for older people and supported housing will be secured, it does not set out design considerations.
01-20	David Barton	BAAP19 Conversions to Flats and Homes in Multiple Occupation	In general, these points are fine BUT only if TVA Principles are adopted. There is however scope for exploring problematic areas- be these historically poorly managed, maintained or vacated should engage a plethora of public events with ALL and any potential stakeholders beyond the Local Authority and landowners that would maximise the chances at regenerating these areas, ensuring quality outcomes for everyone, reduce potential long-term challenges between the Public and Private Sectors and reduces obstacles towards securing grant funding and 3rd party private investment where areas of inconvenience can be actively addressed and resolved with material action much sooner than 2020 and indeed 2035 and 2040.	TVA Principles to be adopted. Council should engage a plethora of public events with ALL and any potential stakeholders beyond the Local Authority and landowners that would maximise the chances at regenerating these areas.	This policy sets out flats and HMOs will be acceptable; it does not set out external design considerations.



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01-21	David Barton	BAAP20 Hawthorne Road/Canal Corridor Regeneration Opportunity Area	In general, these points are fine BUT only if TVA Principles are adopted. There is however scope for exploring problematic areas- be these historically poorly managed, maintained or vacated should engage a plethora of public events with ALL and any potential stakeholders beyond the Local Authority and landowners that would maximise the chances at regenerating these areas, ensuring quality outcomes for everyone, reduce potential long-term challenges between the Public and Private Sectors and reduces obstacles towards securing grant funding and 3rd party private investment where areas of inconvenience can be actively addressed and resolved with material action much sooner than 2020 and indeed 2035 and 2040. Hawthorne Road is a prime example where modular New Build Housing detracts from the overall area and negates the Climate Emergency through the poor use of low carbon-storage materials which couples to the poor aesthetic. That in turn simply makes younger people think that the Local Authority is pushing profit with builders over the community hence cultural mindset of littering and fly tipping, etc owing to lack of respect for officials themselves seemingly let the area go down in quality.	TVA principles to be adopted. Council should engage a plethora of public events with ALL and any potential stakeholders beyond the Local Authority and landowners that would maximise the chances at regenerating these areas.	Comment noted.
11-12	United Utilities	BAAP20 Hawthorne Road/Canal Corridor Regeneration Opportunity Area	<p>We request that any proposals for this area are underpinned by a sustainable foul and surface water management strategy. We request that policy outlines clear requirements for drainage in accordance with the policy wording which we have recommended under the heading of Sustainable Drainage (Foul Water and Surface Water) and Landscaping.</p> <p>The opportunity to discharge to an alternative body to the public combined sewer must be considered early in the design process. In particular, the option presented by the adjacent Leeds Liverpool Canal should be explored. We recommend that the sustainable drainage strategy for the site is given early consideration as part of the development of any masterplan for the site. Early engagement with the Canals and Rivers Trust is required. New landscaping will have a critical role to play in the management of surface water at the site as a result of any development proposals.</p> <p>In accordance with the enclosed Tables 1 and 2, we request a site-specific policy for BAAP21 specifically refers to on-site sewer flood risk using the wording recommended under the heading of Sewer Flood Risk.</p> <p>There are some significant assets that pass through the area. Applicants must not assume that these can be diverted or built over. Early engagement with Uuw on these assets must occur so that the implications for development and construction can be understood.</p>	<p>Sustainable Drainage and Landscaping- Uuw recommends the following wording for inclusion within the AAP:</p> <p>‘All applications must be supported by a strategy for foul and sustainable surface water management. The surface water strategy must be in accordance with the surface water hierarchy and must prioritise multi-functional SuDS. Applicants must identify land that ensures the delivery of multi-functional sustainable drainage in accordance with the four pillars of sustainable drainage which is integrated with the landscaped environment.</p> <p>Landscaping and public realm proposals, including proposals for tree-lined streets, must be integrated with the strategy for sustainable surface water management. This could be achieved through a variety of features including:</p> <ul style="list-style-type: none"> <li>• permeable surfacing;</li> <li>• bio retention tree pits and bio retention landscaping;</li> <li>• rain gardens;</li> <li>• soakaways and filter drainage;</li> <li>• retrofitted swales; and</li> <li>• blue/green roofs.’</li> </ul> <p>Sewer Flood Risk- These could be included as additional site-specific policy or as an amendment to existing draft policy, e.g., Policy BAAP1</p> <p>‘Modelled Sewer Flood Risk</p> <p>Existing public sewers pass through and near to this site which modelling data (and / or flooding incident data) identifies as being at risk of sewer flooding. This will need careful assessment and consideration in the detailed design, masterplanning and drainage details for the site. The risk of sewer flooding could affect the developable area of the site and the detail of the design.’</p> <p>and</p>	<p>The Council considers that its proposed changes to part 9 of policy BAAP1 and its explanation (see above) remove the need for these issues to be repeated by being referred to in policy BAAP20. The reference to the Canal and River Trust at the end of the amended paragraph 5.10 to say “... Developers should engage with United Utilities, the Lead Local Flood Authority and where appropriate the Canal and River Trust from an early stage” was added partly to take account of this United Utilities representation. No changes proposed to policy BAAP20 or its explanation as a result if this representation.</p>

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				<p>'Sewer Flooding Incidents</p> <p>There are flood incidents from the public sewer on-site / in the wider area. Applicants must engage with United Utilities to consider the detailed design of the site and drainage details. The risk of sewer flooding could affect the developable area of the site and the detail of the design.'</p> <p>UU We also recommend the following explanatory text in respect of sewer flood risk matters:</p> <p>'Explanatory Text</p> <p>A range of sites have been identified as at risk of sewer flooding or in the wider vicinity of sewer flooding. In respect of these sites, the applicant must engage with United Utilities prior to any masterplanning to assess the flood risk and ensure development is not located in an area at risk of flooding from the public sewer. Applicants should consider site topography and any exceedance flow paths. Resultant layouts and levels should take account of such existing circumstances. Applicants must demonstrate that the proposed development would be safe and not lead to increased flood risk. Applicants should not assume that changes in levels or changes to the public sewer, including diversion, will be acceptable as such proposals could increase / displace flood risk. It may be necessary to apply the sequential approach and incorporate mitigating measures subject to the detail of the development proposal. Careful consideration will need to be given to the approach to drainage including the management of surface water; the point of connection; whether the proposal will be gravity or pumped; the proposed finished floor and ground levels; the management of exceedance paths from existing and proposed drainage systems and any appropriate mitigating measures to manage any risk of sewer surcharge.'</p>	
01-22	David Barton	BAAP21 Bootle Village Regeneration Opportunity Area	Points 1&2 are fine generally, however Points 3,4,5,6,7&8) incur objections on the grounds that the oldest part of Bootle faces threat of being erased and there hasn't been enough effort to scope the right 3rd party individuals and organisations to resolve historical long-term issues plaguing the area, such as making best use of old buildings. It is insulting to consider stripping old features and simply placing elsewhere when Bootle can be debated to be the oldest entire settlements in the whole of the Borough of Sefton and indeed the region. It should be especially emphasised at this stage of the consultation that There is however scope for exploring problematic areas- be these historically poorly managed, maintained or vacated should engage a plethora of public events with ALL and any potential stakeholders beyond the Local Authority and landowners that would maximise the chances at regenerating these areas, ensuring quality outcomes for everyone, reduce potential long-term challenges between the Public and Private Sectors and reduces obstacles towards securing grant funding and 3rd party private investment where areas of inconvenience can be actively addressed and resolved with material action much sooner than 2020 and indeed 2035 and 2040.	Council should engage a plethora of public events with ALL and any potential stakeholders beyond the Local Authority and landowners that would maximise the chances at regenerating these areas.	Comment noted.

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01-23	David Barton	BAAP22 Open land between Irlam Road and the Asda Store Regeneration Opportunity Area	This incurs a full objection namely citing earlier points raised such as raising the profile of Greenspace the concept being of immense importance in combatting the Climate Crisis, Sefton council's own pledges to reaching Net Zero by 2020 and the fact that there exist scarce actual greenspaces sites. This can and should in fact be considered for sports use with the relevant investment sought to materialise this. Community interaction may be diverted to the Bootle Strand Shopping Centre and other greenspaces where existing facilities cater for some of the infrastructure items suggested here may already be in place.	Site should be considered for sports use with the relevant investment sought to materialise this.	While the site was designated as open space in the 2017 Local Plan, the Council considers this particular open space, especially the part now within BAAP22, to be 'left over land' (part of the open space site is an infilled railway cutting where built development is unlikely to be feasible. Over many decades the site has had very few/ low value low green and blue infrastructure benefits, and over a number of years has been poor quality, poorly maintained and subject to crime and anti-social behaviour, in part due to scarce Council resources. The site has never been used for formal sport. The Council considers it to be an inappropriate size and location for formal sport, notwithstanding the lack of resources bringing it into sports use would entail. Therefore, considering the site-specific issues and history, the Council considers that the development of this site for employment-based uses is acceptable; the site has had instances of anti-social behaviour in the past and it is considered that development may resolve this. No changes to the policy or its explanation are proposed.
01-24	David Barton	BAAP23 Coffee House Bridge Regeneration Opportunity Area	This incurs a full objection namely citing earlier points raised such as raising the profile of Greenspace the concept being of immense importance in combatting the Climate Criss, Sefton council's own pledges to reaching Net Zero by 2020 and the fact that there exist scarce actual greenspaces sites. This can and should in fact be considered for sports use with the relevant investment sought to materialise this. Community interaction may be diverted to the Bootle Strand Shopping Centre and other greenspaces where existing facilities cater for some of the infrastructure items suggested here may already be in place.	Site should be considered for sports use with the relevant investment sought to materialise this.	<p>The Council does not propose changing the policy or its explanation. A fuller justification for this is set out in the AAP (explanation to policy BAAP23) and in the Environment and Climate Change Topic Paper.</p> <p>In summary, this is a former primary school site (school closed, and pitch last used before, 31<sup>st</sup> August 2005, almost two decades ago). The 2023 Playing Pitch and Outdoor Sports Strategy (PPOSS) does not show a shortfall of (age-appropriate) mini pitches in Bootle and Netherton, or Sefton as a whole. The Council has commented an 'Annual Review' of the 2023 PPOSS in consultation with the PPOSS Steering group including Sport England, the Football Foundation and Liverpool County Football Association. As yet there are no indications of future changes to need. Litherland Sports Park site is outside the plan area. The site is subject to the more flexible approach of policy BAAP24, and, in this case, wider environmental improvements would offset the loss of a potential (historic) pitch at playing field on the former school site.</p> <p>The PPOSS also notes that between 2011 and 2021, in Sefton, the population aged 65+ increased by 13.5% while that of 15-64 year olds decreased by 1.3%. The increase in children aged under 15 years was 0.3% compared to 5% nationally and the 15-19 and 20-24 age groups each decreased by at least 15%. That is, the biggest increase in Sefton's population between 2011 and 2021 has been in</p>

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					<p>age groups considered less likely to participate in pitch sports. There is nothing to suggest this trend will change in coming years.</p> <p>At a practical level the Council's has had an effective shortage of funding over recent years with which to maintain existing public greenspaces including playing fields, let alone additional sites (the site is not currently managed by the Council). As a rule of thumb Sefton Council is not in a position to adopt new public greenspace. An alternative is for developers to use management companies for on-going management and maintenance of public open space provided as part of new development. This relies on on-going contributions from occupiers/owners to these costs, for the lifetime of development. This is not without its own challenges.</p> <p>Planning permission was refused in 2021 for a scheme at 'St Mary's Complex' which included housing, an arts hub and community buildings, and later dismissed on appeal. The Council accepted that this compensatory pitch provision in line with the Local Plan requirement would help make the scheme unviable and so failure to provide this compensation was not a reason for refusal. The matter of compensatory provision was not referred to in the appeal decision. It is likely that viability would remain a challenge for this site in the near future.</p>

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09-02	Sport England	BAAP23 Coffee House Bridge Regeneration Opportunity Area	<p>It is proposed that allocation BAAP23 “Coffee House Bridge” will supersede and enlarge the Local Plan allocation MN2.46 “Former St Mary’s Primary School playing fields, Waverley Street, Bootle”. Appendix 1 of the adopted Local Plan lists the site specific requirements for each allocation. Under MN2.46 it states that “Development of this site must ensure that the loss of the former playing pitch (es) is addressed consistent with Local Plan policy NH5. This will be achieved via a commuted sum payment (on a per dwelling basis) towards the provision of a new 3G pitch (es) at Litherland Sports Park”.</p> <p>Para 5.235 of the draft AAP states that this requirement is not being carried forward to the AAP stating “The 2023 Playing Pitch and Open Space Strategy does not show a shortfall of mini pitches in Bootle and Netherton, or Sefton as a whole. The Litherland Sports Park site is also outside the AAP area”.</p> <p>Paragraph 5.236 continues “Instead the Coffee House Bridge site is subject to policy BAAP24 which allows a more flexible approach to wider environmental improvements which would offset the loss of green space on the former school site”.</p> <p>Sport England object to the removal of the commuted sum requirement as draft policy BAAP24 is not considered robust enough to secure financial contributions towards sport and recreation. The proposal would result in additional population and would place additional demand on infrastructure and services, including for sports provision. The financial contribution towards 3G pitches at Litherland Sports Park had been accepted through the local plan examination and the removal of this requirement has not been justified. The Litherland Sports Park is identified in the 2023 PPOSS as a “hub” site. This means it draws a wider catchment. Although it lies outside of the AAP area, it would be assumed that some of the population living within the AAP area would still access and use this facility. The PPOSS 2023 refers to the findings of the LFFP which identifies a second 3G pitch as a potential future project (the LFFP is not an assessment of need and demand but does highlight a pipeline of projects the FA are prioritising). The 3G pitch at Litherland Sports Park is also identified as needing work to gain accreditation to enable match playing opportunities. Given these findings, Sport England consider it appropriate to retain the requirement from local plan policy MN2.46.</p>	<p>Reinstate the existing LP policy requirement under draft policy BAAP23:</p> <p>“Development of this site must ensure that the loss of the former playing pitch (es) is addressed consistent with Local Plan policy NH5. This will be achieved via a commuted sum payment (on a per dwelling basis) towards the provision of a new 3G pitch (es) at Litherland Sports Park”.</p> <p>Additional wording could be included to state that this would not be required if a viability assessment demonstrated the contribution was not viable.</p>	<p>The Council does not propose changing the policy or its explanation. A fuller justification for this is set out in the AAP (explanation to policy BAAP23) and in the Environment and Climate Change Topic Paper.</p> <p>In summary, this is a former primary school site (school closed, and pitch last used before, 31<sup>st</sup> August 2005, almost two decades ago). The 2023 Playing Pitch and Outdoor Sports Strategy (PPOSS) does not show a shortfall of (age-appropriate) mini pitches in Bootle and Netherton, or Sefton as a whole. The Council has commented an ‘Annual Review’ of the 2023 PPOSS in consultation with the PPOSS Steering group including Sport England, the Football Foundation and Liverpool County Football Association. As yet there are no indications of future changes to need. Litherland Sports Park site is outside the plan area. The site is subject to the more flexible approach of policy BAAP24 and, in this case, wider environmental improvements would offset the loss of a potential (historic) pitch at playing field on the former school site.</p> <p>The PPOSS also notes that between 2011 and 2021, in Sefton, the population aged 65+ increased by 13.5% while that of 15-64 year olds decreased by 1.3%. The increase in children aged under 15 years was 0.3% compared to 5% nationally and the 15-19 and 20-24 age groups each decreased by at least 15%. That is, the biggest increase in Sefton’s population between 2011 and 2021 has been in age groups considered less likely to participate in pitch sports. There is nothing to suggest this trend will change in coming years.</p> <p>At a practical level the Council’s has had an effective shortage of funding over recent years with which to maintain existing public greenspaces including playing fields, let alone additional sites (the site is not currently managed by the Council). As a rule of thumb Sefton Council is not in a position to adopt new public greenspace. An alternative is for developers to use management companies for on-going management and maintenance of public open space provided as part of new development. This relies on on-going contributions from occupiers/owners to these costs, for the lifetime of development. This is not without challenges.</p>



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					<p>Planning permission was refused in 2021 for a scheme at 'St Mary's Complex' which included housing, an arts hub and community buildings, and later dismissed on appeal. The Council accepted that this compensatory pitch provision in line with the Local Plan requirement would help make the scheme unviable and so failure to provide this compensation was not a reason for refusal. The matter of compensatory provision was not referred to in the appeal decision. It is likely that viability would remain a challenge for this site in the near future.</p>
01-25	David Barton	BAAP24 Environmental Improvements	<p>In general these points are fine, however as raised earlier there are many ways to improve the natural and built environments through carbon storage-rich old builds and new construction in this TVA style facilitating energy efficient technology upgrades that blend in seamlessly alongside a range of Improved Greenery measures that I myself have proposed in my Greenery Programme article in 2021. Trees should and must be planted completely across ALL ARTERIAL ROUTES AND CARRIAGEWAYS to see swift action taken to combat the climate Crisis and reach net zero by 2020.</p>	<p>Improve the natural and built environments through carbon storage-rich old builds and new construction in TVA style. Trees should and must be planted completely across ALL ARTERIAL ROUTES AND CARRIAGEWAYS to see swift action taken to combat the climate Crisis and reach net zero by 2020.</p>	<p>Policy BAAP8 identifies Priority Routes and part 3 says that "more trees and other planting in appropriate areas" is a priority on these routes. Part 9 of policy BAAP1 Design and other policies such as BAAP4, BAAP9, BAAP14, and especially BAAP24 also support public realm and landscaping enhancements including tree planting. Priority projects for environmental improvement identified in BAAP24 includes ' the right tree in the right place' and may well include tree and hedgerow planting on Priority Routes (see also the Environment and Climate Change Topic Paper). No changes proposed to policy or its explanation.</p>



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09-03	Sport England	BAAP24 Environmental Improvements	<p>It is unclear how BAAP24 will apply in relation to local plan obligation requirements. The table provided at Appendix A highlights that no local plan policies will be superseded by the policy. It is therefore assumed that BAAP24 will apply alongside Policy IN1 of the Local Plan. This itself refers back to the Infrastructure Delivery Plan. There is a lack of clarity as to how the two policies would work in conjunction with each other, i.e. which would have priority. Supporting paragraph 5.247 states that “the environmental improvements secured under this policy will not replace the need for other developer contributions required through other policies and regimes, which could include affordable housing, transport improvements, Biodiversity Net Gain, recreation mitigation, playing pitches, health facilities and other infrastructure considered necessary to make a proposal acceptable in planning terms”. Currently it is unclear how any financial contributions to sport and recreation will be secured. The Playing Pitch Strategy (PPOSS) for Bootle sets out a recommended approach for securing developer contributions.</p> <p>This sets out that setting out that the PPOSS and Sport England’s Playing Pitch Calculator (PPC) should form the basis for any future negotiation for new provision and/or enhancement of existing provision and subsequent maintenance. It is important to note that none of the allocations included in the AAP have any policy requirements for sport and recreation. There is therefore no obvious mechanism for securing any of the improvements included as recommendations for the Bootle and Netherton settlement area as included in the PPOSS (page 60).</p>		<p>The Council considers that the current approach set out in policies BAAP11 and BAAP24 is appropriate, clear and is in conformity rather than conflict with the delivery of Local Plan policy IN1 ‘Infrastructure and developer contributions’. No changes to these policies or their explanation are proposed. A detailed justification and explanation are set out in the Environment and Climate Change Topic Paper. A summary is provided below.</p> <p>Sefton’s 2023 Playing Pitch and Outdoor Sports Strategy (PPOSS) suggests a relatively nuanced approach to use of Sport England’s Playing Pitch Calculator, with the Council working with Sport England to develop a process and guidance for obtaining developer contributions in any future Local Plan [rather than development plan] review. However, the text also states that “it should also be recognised that new homes in Sefton provide for the housing needs of the existing population rather than purely for population growth and therefore that the Playing Pitch Calculator alone is too blunt an instrument for Sefton”.</p> <p>The Council’s view is while that monies from housing sites within the plan area (under policies BAAP11 and the framework for priorities set out in BAAP24) could be directed towards the PPOSS settlement priorities in Bootle, in practice, that means that the scope of improvements is relatively limited, to 4 potential projects; enhancing the maintenance regime on Stuart Road playing fields and Orrell Mount Park, making sure Bootle FC has a sinking fund for replacing the surface of the two small sided artificial turf football pitches and looking to re-surface the tennis court in Derby Park and install Lawn Tennis Association initiatives to increase opportunities for year-round recreational tennis. The Council considers firstly that there is no scope for outdoor sports provision on additional sites in the plan area.</p> <p>Secondly, the scale of improvements to existing sites is relatively limited and it would not be appropriate to require all new housing development in the plan area to provide specifically for this as this could lead to a surplus of monies.</p> <p>Thirdly, using the Playing Pitch Calculator “as a basis for future negotiation”, as Sport England suggest, would give insufficient certainty to developers; no more certainty than the approach currently set out in policy BAAP24.</p> <p>Also, football, cricket and tennis form only part of the sport, wider recreation and health needs of the local community.</p> <p>The Council considers that policy BAAP24 provides an</p>

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					effective mechanism for securing the PPOSS and wider recreation, health and environment priorities in the AAP area.
10-03	Canals and River Trust	BAAP24 Environmental Improvements	This policy sets out that development above a certain threshold must make a financial contribution toward environmental improvements and the monies will be used to secure environmental improvements under criteria (5). We note that the policy makes references to improving greenspaces and improving priority routes between new development and existing public greenspaces. As the canal corridor is recognised as a priority route (BAAP8), we would welcome the inclusions of 'blue spaces' into the wording of the policy, in addition to greenspaces.	Add bluespaces to policy wording.	It is considered that the final bullet under Part 5 of this policy would cover this.
07-08	Home Builders Federation	BAAP24 Environmental Improvements	<p>Policy BAAP24 is not considered to be sound as it is not justified, is not effective and is not consistent with national policy for the following reasons:</p> <p>This policy states that residential developments that create 10 dwellings or more should provide proportionate contribution to environmental improvements in the local area. It goes on to state that the cost in qualifying schemes is set at £2,680 per housing unit.</p> <p>The HBF considers that it is not clear what the evidence is for this policy and why it is required, plans can only be considered to sound if they are justified and consistent with national policy. The NPPF is clear that Plans should set out the contributions expected from development and that such policies should not undermine the deliverability of the Plan. The HBF have already highlighted the significant viability challenges identified in Bootle, as such it is important that there is an evidenced need for this policy.</p>		<p>The Council does not agree with the representation of the HBF. A detailed justification and explanation are set out in the Environment and Climate Change Topic Paper. A summary is provided below.</p> <p>The Council considers that its approach to enhancing new public greenspace and green and blue infrastructure rather than creating new substantive public greenspaces is appropriate and justified. Policy BAAP24 is the key means to achieve this, supported by other AAP policies including BAAP1 , BAAP8 and BAAP11.</p> <p>There is a clear need and justification for each of the priorities identified in part 5 of policy BAAP24.</p> <p>Regarding the specific issue of the commuted sum, its justification and viability, paragraph 5.246 of the explanation to policy BAAP24 sets out the Council's approach to viability, referring to the viability assessment of the emerging plan. In summary, whilst many sites in Bootle have viability challenges, this may improve over the plan period and so the Council should continue to seek a range of planning obligations (subject to viability). The Council would expect the applicant to bear the cost of preparing both the viability assessment and its assessment by the Council's viability consultant, in line with usual practice for example in relation to</p>

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					<p>Local Plan policies for affordable housing and education contributions. (see * below).</p> <p>The figure of £2,680 is based on extensive evidence collated over many years. This is the commuted sum used for off-site open space provision in relation to Local Plan policy EQ9 'Provision of public open space, strategic paths and trees' and the 2017 Open Space SPD, which was carried forward from the previous (2008) Green Space, Trees and Development Supplementary Planning Document. The amount changes (usually, rises) annual in line with inflation. The sum has always been based on a contribution (rather than the full cost) of open space provision, including allowances for capital works, establishment (for 3 years), maintenance (for up to 10 years) and administration costs; plus any associated legal costs.</p> <p>It is not considered to be an effective use of resources to work up and cost detailed schemes at the current time. However, the Council considers that this sum would represent a contribution towards the cost of any environmental improvements under policy BAAP24. As such, and given the viability clauses and evidence of need for all of the projects listed, the Council considers that this sum is in line with the tests set out in paragraph 57 of the December 2023 National Planning Policy Framework.</p> <p>(*): The Council proposes to amend the explanation to this policy to make clear the viability assessment mechanism and that applicants should bear the cost. A new paragraph of explanation (based on paragraph 8.21 of the Local Plan) could say:  <b>“5.247A Where an applicant seeks to depart from the policy position and provision of a commuted sum due to viability consideration, the Council will require a full financial assessment to be submitted by the applicants. This will be appraised by independent economic viability consultants. The applicant will be required to meet the full cost of this work”.</b></p>
07-07	Home Builders Federation	Section 6 Implementation and Monitoring	Section 6 of the Plan sets out the Council’s proposed monitoring indicators for the AAP. It identifies the policy, an indicator related to the policy and a target or direction of travel for each indicator. The HBF recommends that the Council include an appropriate monitoring framework which not only sets out the monitoring indicators along with the relevant policies, but also sets out the data source and where they will be reported, this should also include the targets that the Plan is hoping to achieve and actions to be taken if the targets are not met. The HBF recommends that the Council provide details as to how the plan will actually be monitored, and identifies when, why and how actions will be taken to address any issues identified.	Include an appropriate monitoring framework and provide details as to how the plan will be monitored.	The introduction to section 6 sets out that the indicators will be reported out in the Council's Authority Monitoring Report with an in depth report to be done at 5 yearly intervals. These reports will set out how successful the policies have been and help inform a review of the AAP or future Local Plans. The data will be secured from the Planning departments data and supplemented from other departments and, if necessary, site visits.

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04-04	National Highways	Other	In terms of impacts to the Strategic Road Network, consideration must be given to how development near the A5036 would impact safety and congestion. It is expected that any proposals brought forward as a result of this plan would need to consider how the developments would impact the route, with developers providing a vision-led transport assessment in-line with the latest guidance. Early discussions regarding masterplanning or pre-application contact on individual sites would be the most appropriate time to accomplish this.		The sites near the A5036 were originally allocated in the Sefton Local Plan and the wider highways impact was considered then. Local Plan policy IN2 requests that any development that will affect the strategic road network will require a Transport Assessment. The main employment allocation next to the A5036, Atlantic Park, has been approved for new employment units, and these are already under construction. The impact on the A5036 will be considered as part of that application.
05-01	Natural England	Other	Natural England welcomes the plan, and the direct links made between a healthier natural environment and healthier communities, the support for the emerging Local Nature Recovery Strategy and Recreation Mitigation Strategy, and the inclusion of environmental improvement policies. We have no further comments to make on the draft plan but would like the opportunity to comment at later stages in the development of the Bootle Area Action Plan.		Comments noted and welcomed.
07-06	Home Builders Federation	Other	The Council will also need to ensure that the Plan is viable, that policies are realistic, and that the total cumulative costs of all relevant policies, including those in the Sefton Plan and its supporting documentation, will not undermine deliverability of the Plan. The Council need to ensure that policy requirements should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned development to be deliverable without need for further viability assessment at the decision-making stage.		The Bootle AAP viability assessments has considered cost of relevant policies, and the Council considers that, whilst challenging in some areas, the policies would be deliverable.
11-01	United Utilities	Other	<p>UUW notes that a number of your proposed allocations are not guided by site-specific policies. UUW strongly encourages the council to include detailed site-specific policy that governs the allocation of any site so that key development considerations can be explicitly referenced in the policy. We believe that clearer requirements help to achieve more sustainable development. In relation to those locations that are proposed to be the subject of a masterplan, UUW requests the opportunity to engage with the council in the preparation of such masterplans.</p> <p>It is important to outline the need for our assets to be fully considered in any proposals you bring forward. We can advise you on this further when you provide us with the relevant GIS shp files. At this stage we can confirm that there are a number of allocations, which have significant assets that pass through them which would be material to site design.</p> <ul style="list-style-type: none"> <li>-UUW will not allow building over or in close proximity to a water main.</li> <li>-UUW will not allow a new building to be erected over or in close proximity to a public sewer or any other wastewater pipeline. This will only be reviewed in exceptional circumstances.</li> <li>-Site promoters should not assume that our assets can be diverted.</li> <li>-On occasion, an asset protection matter within a site can preclude the delivery of development.</li> </ul> <p>As you would expect, there are a range water and wastewater assets through, and within the vicinity of, the proposed allocations. It is critical that site promoters engage with UUW on the detail of their design and the proposed construction works. All UUW assets will need to be afforded due regard in the masterplanning process for a site. This should include careful consideration of landscaping and biodiversity proposals in the vicinity of our assets and any changes in levels which will need to be agreed in writing. The details of any services, access or roads (temporary or permanent) that are proposed in the easement / offset area for our assets must also be agreed.</p>		<p>Many of these issues are considered to lie outside the scope of local planning policies / the planning policy framework and it would not be appropriate or proportionate to include them in any policy or its explanation.</p> <p>However, the Council has proposed changes to part 9 of policy BAAP1 and its explanation (see above) to better reflect the concerns of United Utilities. These include proposed changes to the end of the amended paragraph 5.10 to say "... Developers should engage with United Utilities ... from an early stage". Also, section 2 of Sefton's 2018 SuDS and Flood Risk Information Note encourages applicants to make use of United Utilities free pre-development service.</p>

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11-02	United Utilities	Other	<p>We wish to note that any growth needs to be carefully planned to ensure new infrastructure provision does not cause any unexpected delays to development delivery. The full detail of the development proposals is not yet known. For example, the detail of the drainage proposals, the points of connection or the water supply requirements. As a result, it is important that we highlight that in the absence of such detail, we cannot fully conclude the impact on our infrastructure and therefore as more detail becomes available, it may be necessary to co-ordinate the timing for the</p> <p>delivery of development with the timing for delivery of infrastructure. We continue to recommend that you include a development management policy in your draft AAP to this effect.</p>	<p>UUS recommended policy-</p> <p>'Once more details are known on development sites, it may be necessary to coordinate the delivery of development with timing for the delivery of infrastructure improvements.'</p>	<p>This is a considered to be a wider issue relating to provision of all necessary infrastructure. It is considered that this is adequately dealt with by Local Plan policy IN1 'Infrastructure and developer contributions'.</p>
11-03	United Utilities	Other	<p>UUW has concerns regarding any site allocations, which are in multiple land ownerships. The experience of UUW is that where sites are in multiple ownership, the achievement of sustainable development can be compromised by developers/applicants working independently. We therefore encourage you to make early contact with all landowners/site promoters and challenge those landowners on how they intend to work together, preferably as part of a legally binding delivery framework and / or masterplan. We believe that raising this point is in the best interest of delivering regeneration and achieving challenging delivery targets from allocated sites in the most sustainable and co-ordinated manner.</p> <p>We continue to recommend that future policy requires applicants to provide drainage strategies for foul and surface water. We recommend that policy requires the preparation of an infrastructure phasing and delivery strategy. We recommend that early consideration is given to the infrastructure strategy as part of the preparation of the local plan and to ensure a co-ordinated approach to the delivery of new development and infrastructure in the areas that you have identified for development</p>	<p>UUW would recommend the following policy is considered for inclusion in the AAP:</p> <p>'Where applications are submitted on land which is part of a wider allocation / development, applicants will be expected to submit allocation/development wide infrastructure strategies to demonstrate how the site will be brought forward in a co-ordinated manner. The strategies shall be prepared in liaison with infrastructure providers and demonstrate how each phase interacts with other phases and ensure coordination between phases of the development over lengthy time periods and by numerous developers. Where necessary, the strategy must be updated to reflect any changing circumstances between phase(s) during the delivery of the development.'</p>	<p>This is a considered to be a wider issue relating to provision of all necessary infrastructure. It is considered that this is adequately dealt with by Local Plan policy IN1 'Infrastructure and developer contributions'.</p>
11-16	United Utilities	Other	<p>UUW Property Interests-</p> <p>On receipt of the aforementioned GIS shp files, we would wish to confirm any allocations where we have land interests such as easements and rights of access which are in addition to our statutory rights for inspection, maintenance and repair. These land interests may have restrictions that must be adhered to.</p> <p>It is the responsibility of the developer to obtain a copy of the associated legal document, available from UUW's Legal Services or Land Registry and to comply with the provisions stated within the document.</p> <p>We recommend that landowners/developers contact our Property Services team at PropertyGeneralEnquiries@uuplc.co.uk to discuss how any proposals may interact with our land interests. Our easements, pipe structures and access rights should not be affected by the design and construction of new development.</p>		<p>Most of these issues are considered to lie outside the scope of local planning policies / the planning policy framework and it would not be appropriate or proportionate to include them in any policy or its explanation.</p> <p>However, the Council has proposed changes to part 9 of policy BAAP1 and its explanation (see above) to better reflect the concerns of United Utilities. These include proposed changes to the end of the amended paragraph 5.10 to say "... Developers should engage with United Utilities ... from an early stage". Also, section 2 of Sefton's 2018 SuDS and Flood Risk Information Note encourages applicants to make use of United Utilities free pre-development service.</p>
12-01	Homes England	Other	<p>Homes England would like to express its support for the efforts of Sefton Council in preparing an Area Action Plan for the future needs of Bootle. Homes England supports the preparation of plans to ensure that long term housing needs and economic growth ambitions are met. Homes England acknowledges that the regeneration and evolution of Bootle is a key priority for Sefton Council.</p> <p>Homes England would be interested in further exploring master planning efforts for the future use of the office quarter to understand the scale of opportunity and will continue to work in partnership with Sefton Council to explore prospects to support delivery of its local housing needs and ambitions, including those within Bootle.</p>		<p>Comments noted and welcomed. The Council would welcome further input on masterplanning from Homes England.</p>
02-01	Historic England		No comment.		No comments.



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08-01	Liverpool City Region Combined Authority		<p>Overall, the plan's vision and objectives are considered to align with those of the emerging SDS, particularly the impetus to regenerate and revitalise the town, attract investment, bring environmental improvements and increase opportunities for its residents and communities. The AAP's recognition of the emerging SDS and its future role, when published/adopted, as part of the Development Plan for Sefton is welcomed.</p> <p>Draft Policy LCR SS1 of the emerging SDS identifies an 'Inner Urban Area' in which Bootle (and the AAP area) lies. This area is to provide a focus for sustainable regeneration, benefitting from its proximity to Liverpool City Centre and complementing the wider city region. New development within the Inner Urban Area would be expected to:</p> <ul style="list-style-type: none"> <li>• Maximise use of brownfield and underutilised land to catalyse urban regeneration.</li> <li>• Deliver regeneration objectives including tackling deprivation and inequality, attraction of investment, creation of job opportunities and environmental improvement.</li> <li>• Provide new, high-quality housing for all kinds of people, including family homes and affordable housing, integrating positively with existing communities.</li> <li>• Create new and revitalised mixed communities, helping to tackle previous housing market failure.</li> <li>• Help to address long standing issues of dereliction and land contamination.</li> <li>• Maximise opportunities to integrate and improve connectivity with Liverpool City Centre, adjacent areas and neighbourhoods within the Inner Urban Area and elsewhere in the city region.</li> </ul> <p>For Bootle in particular, emerging SDS policy outlines the key planning priorities for the town, consistent with the AAP. These are:</p> <ul style="list-style-type: none"> <li>• Repurposing and regenerating the Strand shopping centre and sustainable development of the canal side.</li> <li>• Enhancing and increasing of town centre living, higher and further educational facilities, employment opportunities, high quality public space and leisure and cultural attractions.</li> <li>• Consolidating the Strand's position as the main focus of shopping, leisure, cultural, community and other uses for Bootle's residents and those in the wider area.</li> <li>• The provision of a mixed high-quality offer for residents, businesses, employees and students throughout Bootle, including a greater choice of house types and good quality and well-located employment sites.</li> <li>• Improved physical integration and connectivity (including active travel links).</li> <li>• Enabling Bootle to reshape and grow its reputation as a highly desirable and sustainable residential, education, leisure and business location.</li> <li>• Making Bootle a healthier place to live, through the provision of an environment that enables residents to live a healthier lifestyle (including Green Infrastructure).</li> <li>• Enabling Bootle to build upon its excellent location in the city region, on the coast and close to the motorway and rail network.</li> <li>• Supporting opportunities to repurpose and redevelop vacant land and buildings.</li> </ul>		<p>Comments noted and welcomed. The Council will continue to work with the Liverpool CA team as they progress the SDS and will support the identification of Bootle as an area for regeneration in that plan.</p>



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			<p>•Protecting Bootle’s valued built heritage and supporting the reuse of heritage assets for suitable viable uses.</p> <p>The policies and proposals in the Draft Bootle AAP are therefore considered to present a good overall strategic fit with emerging SDS policy. The plan would also help in the achievement of wider LCRCA priority objectives including tackling climate change, the promotion of active travel and sustainable transport modes, skills and education provision, promotion of economic growth and job creation, and securing environmental improvements.</p> <p>In addition, the plan is considered to provide a positive planning framework for the delivery of development projects funded by the LCRCA (such as those part of the Brownfield Land Fund programme).</p>		