



Bootle Area Action Plan

Preferred Option Stage

Consultation Report

APRIL 2024

Introduction

1. This Consultation Report has been prepared to provide a summary of the activities undertaken during the consultation on the Preferred Option stage of the Bootle Area Action plan (AAP). It also provides a detailed summary of the comments received during the consultation.

2. It is structured as follows:

- To provide a summary of the consultation activities undertaken.
- To summarise the feedback received; and
- To outline the next steps of the AAP process.

Background

3. Bootle is one of the main settlements in the borough of Sefton and is a regeneration priority for Sefton Council.

4. In recent years Sefton Council purchased the Strand Shopping Centre in Bootle, alongside some of its neighbouring sites, with a view of kick-starting the regeneration of the town.

5. To complement the work that is due to be undertaken on The Strand in the coming years, Sefton Council has considered how best to bring forward the regeneration of the wider Bootle area in partnership with the residents and stakeholders of the town and has decided that the most robust and comprehensive way to achieve this would be through an AAP for Bootle.

6. The AAP will set out an overall vision for the town which will guide public and private investment. It will identify a list of projects that would be suitable for development and provide certainty to the private sector that Bootle is a good place to invest. It will also help to secure the homes that people need and want, good quality open spaces and facilities, as well as job opportunities.

Policy Context

7. Sefton Council adopted the Sefton Local Plan in April 2017. This sets out a vision for the future of Sefton, for a 15 year period up to 2030, and a framework for the borough to grow in a positive and balanced way. The Local Plan forms part of the Development Plan alongside 'made' Neighbourhood Plans.

8. An Area Action Plan (AAP) is a type of Development Plan Document that provides specific planning policy and guidance for an area where significant regeneration or investment needs to be delivered. Once formally adopted, the AAP will form part of the Development Plan and will sit alongside the Local Plan.

9. National Planning Policy Guidance (Section 18 of the Planning and Compulsory Purchase Act 2004) sets out that local planning authorities must produce a Statement of Community

Involvement (SCI) to stipulate what consultation will take place in the preparation of Planning Policy documents. SMBC adopted its SCI in March 2018.

10. The document includes a summary of the consultation stages and methods that Sefton Council will use when consulting on a Local Plan or planning policy documents. These are set out in Table 1.1 below.

Table 1.1: Stages of consultation on planning policy documents

Local Plan Stage	Consultation Duration	Consultation Methods
Scoping Consultation (Regulation 18- Town and Country Planning Regulations (Local Planning) 2012)	Minimum of 6 weeks (excluding Bank Holidays)	<ul style="list-style-type: none"> Written/Email consultations with statutory consultees, general consultees on our database, other relevant stakeholders, individuals and organisations who have expressed a wish to be consulted or have previously made comments and;
Preferred Option Consultation (Regulation 18- Town and Country Planning Regulations (Local Planning) 2012)	Minimum of 6 weeks (excluding Bank Holidays)	<ul style="list-style-type: none"> Consultation document available on the Council's website and hard copies available at the Council offices and libraries and; Inviting representation on the document through press advertisements and a notice on the Council's website and;
Publication version Consultation (Regulation 19/20- Town and Country Planning Regulations (Local Planning) 2012)	Minimum of 6 weeks (excluding Bank Holidays)	<ul style="list-style-type: none"> Public consultation events (at Scoping and Preferred Option stages)

11. Before any consultation activity is undertaken on planning policy documents, the proposed consultation methods are reviewed by the Council's Consultation and Engagement Panel made up of various elected members. The Panel assesses the proposals and makes suggestions to increase the effectiveness of the consultation.

12. A Bootle AAP Community Engagement Plan (CEP) was produced in June 2021. This was presented to members of the Consultation and Engagement Panel on Friday 9 July 2021. Feedback received from this session informed the activities undertaken during the consultation.

Timescales for the Area Action Plan

13. The Area Action Plan is prepared over a number of separately defined stages. These are set out below:

Stage	Dates
Scoping 'Issues and Options'	October 2021 to January 2022
Preferred Options Stage	August to November 2023
Publication Draft	July to October 2024
Submission and Examination	From November 2024

Consultation Activities

14. As with the Issues and Options stage, the Council prepared a [Consultation Leaflet](#) and had this delivered to every home and business in the Bootle AAP area. This is approximately 24,000 addresses.

15. An advert was placed in the local press and press releases went out to over 70 industry publications such as [Place North West](#), [Liverpool World](#), and [Liverpool Growth Platform](#).

16. The Council hosted drop in events for residents to come along and discuss the AAP. They were held at a pop up shop at Parkside in the Strand Shopping Centre on:

- Friday 8th September, between 10 – 2pm
- Tuesday 12th September, between 1 – 5pm
- Saturday 30th September, between 10 – 2pm

17. Copies of the documents were available online at www.sefton.gov.uk/BootleAAP and hard copies made available at:

- Bootle Library, Stanley Road
- Magdalen House, Trinity Road
- Bootle Town Hall, Oriel Road

18. Online workshops were planned, but due to lack of interest, these did not go ahead.

Social Media

19. Throughout the Preferred Options consultation period a number of social media posts were published on Sefton Council's accounts promoting the consultation. The table below shows the accounts used and the engagement gained on each.

Instagram:

	Post 1	Post 2
Likes	70	18
Saves	11	1
Reach	3,140	840
Accounts engaged	82	19

Facebook:

	Post 1	Post 2
Post reactions	7	8
Post shares	6	5
Comments	1	16
Reach	4,645	3,654
Accounts engaged	17	19

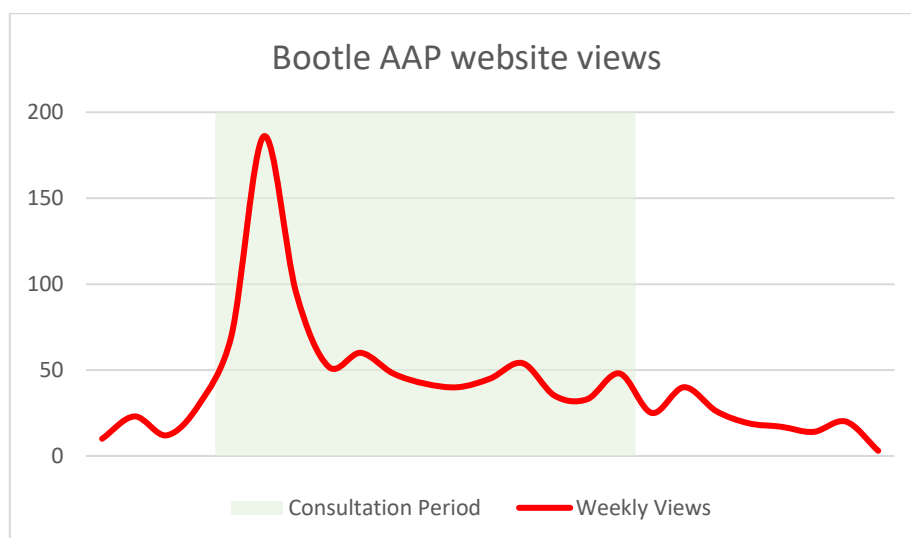
LinkedIn:

	Post 1	Post 2
Impressions	976	596
Clicks	115	23
Reactions	13	26
Comments	0	1
Reposts	2	4
Engagement rate	13.32%	9.06%

Consultation Webpage

20. A dedicated page was available on the Council's website which included information about the AAP (www.sefton.gov.uk/bootleaap). The pages included an introduction to the process, a downloadable version of the community newsletter, a link to a full version of the Preferred Options document, details of the consultation events, an online feedback form and other details of how feedback could be provided.

21. In total the Bootle AAP webpage received over 800 views during the consultation period. The peak was at the start of the 12 week consultation period when the website has over 180 views in a week, with about 40-50 views each week for the remaining consultation period.



22. The webpage will remain live throughout the process of the AAP and will be updated at each stage of the process.

Feedback Channels

23. In order to ensure stakeholders could provide feedback on the Issues. These included:

- A postal address: Planning Department, Ground Floor Magdalen House, Trinity Road, Bootle L20 3NJ
- A dedicated email address: Bootleaap@sefton.gov.uk
- Dedicated comment section on the consultation website: www.sefton.gov.uk/bootleAAP

Consultation Responses

24. Despite the significant publicity around the Bootle AAP Preferred Options engagement, there were limited formal responses. The comments submitted are summarised below with a Council response and proposed changes to the Bootle AAP as a result.

Who responded	Policy Commenting on	Summary of comment	Council Response	Changes to AAP
Resident	BAAP19 Conversions to Flats and Homes in Multiple Occupation	<p>BAAP19 states that conversion of flats will only be permitted where it will not cause harm to</p> <ul style="list-style-type: none"> •character of the area - the anti-social behaviour problem has lessened substantially since Irlam house has been empty. •living conditions, which are already cramped and having parking issues with HSE workers parking on an except for access road. <p>The plan also states that Sefton council will restrict new or other developments where people will be in poor environmental quality, especially the air quality, yet the council sold off Irlam house to a private company to do with as they please. It is an absolute eyesore, and the area has been better whilst the block has been empty. I have seen a lot of anti-social behaviour, the estate is better with it empty or gone.</p> <p>Why, therefore, if the council are pulling down high rises in Seaforth don't, they pull down Irlam house and give the area some green belt space to help counteract the poor air quality we live with off the docks, specifically the dust and explosions from EMR.</p>	Noted. Irlam House is due to be renovated soon. Bootle Area Action Plan seeks to improve environmental quality across the Plan area.	None
Eskmuir Securities Ltd	Section 1	Eskmuir support the recognition of the presumption in favour of sustainable development contained within the National Planning Policy Framework (July 2021) ("NPPF"). As one the four tests of soundness set out in paragraph 35 of the NPPF, development plan documents, such as the BAAP, must be consistent with the NPPF and so the cornerstone of the BAAP must also be one of a presumption in favour of sustainable development.	Noted	None
Eskmuir Securities Ltd	Section 1	Eskmuir support the recognition of the importance of economic development. In this regard, paragraph 82 part d) of the NPPF is also highly relevant (in addition to paragraph 81) and should be a core theme running through the BAAP. It notes that planning policies should: "be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances." On this basis, Eskmuir reiterates the need for any emerging planning policies to ensure suitable flexibility to not directly or indirectly impede economic growth.	Noted	None
Eskmuir Securities Ltd	BAAP12 Employment Land Provision	Whilst the importance of maintaining sites/buildings for employment purposes is understood, this needs to be balanced against the changing operations of employers and the way that they use land. Planning policy needs to be responsive to this. As noted above, the requirement for responsiveness and flexibility is recognised in paragraph 82 part d) of the NPPF. On this basis, Eskmuir would encourage the policy position within the BAAP to be sufficiently flexible so as to encourage opportunities for a wide range of employment and employment generating uses. Such uses may go beyond those Use Classes typically considered 'employment uses' (Class E(g), B2 and B8). Sufficient flexibility must therefore be provided within policy to allow for the introduction of all employment, employment generating and alternative uses or wholesale redevelopment to alternative and suitable land uses (e.g. residential), subject to appropriate tests being met. It is important that the policy approach is sufficiently flexible that takes account of possible changing economic circumstances over the entire plan period of the BAAP, without requiring a review of the document. It is suggested that criteria-based tests are used to allow for the alternative use of protected employment sites. Eskmuir would welcome engagement on the possible wording of such criteria (such as those found in BAAP12 and BAAP13) now and during this and future stages of the BAAP preparation.	Policy BAAP12 does provide flexibility for existing employment areas. However, this has to be balanced with a need to protect employment sites from other uses. However, the Council will amend the policy to allow for a slightly wider range of employment generating uses. It will also allow for the 2 year period for vacancy to take account of a period of notice given.	Changes to policy BAAP13 part1b as follows: The land/premises are currently vacant and have been continuously and actively marketed for the permitted uses for at least 2 years (starting either from the date the site became vacant or when prior notice of an intent to vacant the premises by the occupant was given) at a reasonable market rate (i.e. rent or capital values) and it has been demonstrated in a formal marketing report that there is no reasonable prospect of the site being used for the employment use identified in BAAP12.

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Eskmuir Securities Ltd	BAAP12 Employment Land Provision	<p>In relation to the Kingfisher Business Park (which is assessed alongside Orrell Mount Business Park), the SEL&PSA recommends the site be retained for employment generating purposes, for which it identifies Classes E(g), B2 and B8 noted as being appropriate. Importantly, it does not recommend restricting uses to Class E(g)(iii) only, as currently drafted in BAAP12.</p> <p>It is therefore not clear why BAAP12 (Employment Land Provision) as currently drafted goes further than the evidence bases indicates by being more prescriptive on Class E(g) uses for the five sites that site within a 'General industry' subgroup. We note the same Use Classes are recommended in the SEL&PSA for Atlantic Park (BE7), Senate Business Park (BE8) and Bridle Road (BE9) yet these three sites are categorised under a 'General employment' subgroup within BAAP12 which affords full flexibility within Class E(g) – i.e. Class E(g)(i), E(g)(ii) and E(g)(iii).</p> <p>In this regard, Eskmuir does not consider the distinction between 'General industrial' and 'General employment' sites as currently drafted within BAAP12 is necessary nor justified against the evidence base (i.e. the SEL&PSA) and is therefore not positively prepared, justified, effective nor consistent with national policy, as specifically required by paragraph 35 of the NPPF. The current distinction between 'General industrial' and 'General employment' sites adds an additional layer of policy control where it is not necessary and at adds with the flexibility encouraged by the NPPF. Eskmuir recommend all sites identified under these two groups be merged into a single group allowing for full flexibility across Classes E(g)(i), E(g)(ii), E(g)(iii), B2 and/or B8 and other complementary or employment generating uses appropriate to the context. Without prejudice, the identification and need to distinguish a subgroup for office-led business parks is better understood.</p>	<p>Office uses are town centre uses as defined by the NPPF. Therefore, the Council are looking to prioritise new office development in or immediately to our centres, especially Bootle. Bootle Office Quarter is also a designated location for office developments and currently has a high vacancy level. It would be unsustainable to encourage office developments in out-of-centre employment locations that are not well connected by public transport (compared to our centres).</p> <p>Atlantic Park and Senate Business Park are two of Sefton's strategic employment locations and therefore the Council accept that they will be suitable locations for high quality, large scale offices. It is accepted that Bridle Road should not be treated differently to other general industrial sites, and this will be moved accordingly. We will also rename the General Employment section to Strategic Employment Locations.</p>	Rename the 'General Employment' sites to 'Strategic Employment Locations'. Move Bridle Road to the General Industry section.
Eskmuir Securities Ltd	BAAP12 Employment Land Provision	<p>Much of this text appears to be copied from the SEL&PSA and is broadly a factual account of the position at Kingfisher Business Park.</p> <p>Eskmuir would add that despite generally low vacancy levels, a number of leases at Kingfisher Business Park are due to expire in the coming years with others being subject upcoming to lease breaks which could lead to a changing position in the relatively short/medium term that the BAAP must account and allow for. This could mean that there is a lot of available capacity with the Kingfisher Business Park – flexibility is then key to marketing of units to reduce void periods and encourage occupation.</p>	Comment noted. It is considered the policy approach in BAAP12, with proposed amendments, provides sufficient flexibility for employment sites.	In Policy BAAP12 part 1, add the following point: <ul style="list-style-type: none"> • Other suitable employment generating 'sui generis' uses that are not 'town centre uses' (as defined in the NPPF)
Eskmuir Securities Ltd	BAAP13 Protection of Employment Land	<p>It appears BAAP13 seeks to provide additional policy control over the introduction of uses which do not conform to the specified uses identified in BAAP12. For Kingfisher Business Park, and as currently drafted, this would mean BAAP13 is triggered for any use falling outside of Class E(g)(iii), B2 and B8. This very fact, in isolation and in combination with the criteria of BAAP13, is considered overly onerous and at odds with paragraph 82 of the NPPF.</p> <p>Part 1a. of BAAP13 is too prescriptive and should not use scale as the arbitrary determining factor (e.g. "small scale" and "ancillary") but instead use the phrase "complementary". This would represent a better assessment point and allow flexibility promoted in the NPPF.</p> <p>Part 1b. is also considered too onerous in requiring a two-year marketing exercise. This is not considered positive and could have the unintended consequences of keeping a site/unit vacant for extended periods of time where it could otherwise be occupied by a complementary use to the benefit of economic development. As currently drafted, the criteria found in BAAP13 would give rise to undue restrictions upon Kingfisher Business Park. It is recommended the criteria be reconsidered. This could, in part, also be resolved by the wider points above on BAAP12 that Kingfisher Business Park should be recognised as being suitable for Classes E(g)(i), E(g)(ii), E(g)(iii), B2 and/or B8 and other complementary or employment generating uses appropriate to the context (thus meaning BAAP13 is triggered less often).</p>	Additional flexibility has been provided to the range of allowed uses in Policy BAAP12. Therefore, it is not proposed to add in reference to complementary uses to this policy as this could not be clearly defined and could lead to uncertainty what would be acceptable. Whilst the 2 year marketing period is to be retained, it is proposed that this period can commence once the notice from the occupant has been given (i.e. it can include notice period as long as the premises/site are marketed during this period). 2 years is being used to allow for fluctuations in the economy and changes in demand for business units. We don't want to lose land/units from employment in a period of downturn, to then be short of accommodation in an upturn. This reflects the difficult that we have in delivering new employment sites/units and therefore the	Changes made to both BAAP12 part1 and BAAP13 part 1b (see above)

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			importance of protecting the existing ones we have.	
Eskmuir Securities Ltd	BAAP14 Limiting the Impact of Industry on Residents	<p>Eskmuir considers the occupiers of Kingfisher Business Park are presently operating in a way such that it is not detrimental to the amenity of nearby residential areas located to the south and west. However, linked to the request for sufficient flexibility, it is essential that the planning policy position set out within the BAAP is sufficiently responsive so that if an existing operation does have a detrimental impact on residential amenity, alternative uses can be permissible. This relates to Eskmuir's earlier comments whereby, as currently drafted, BAAP12 permits Class E(g)(iii) at Kingfisher Business Park but not Classes E(g)(i) and E(g)(ii).</p> <p>It is also important the agent of change principle is also applied such that existing occupiers of Kingfisher Business Park are not affected as a result of other incoming uses on neighbouring sites. For example, the operations being undertaken by occupiers at Kingfisher Business Park should not be affected as a result of newer neighbouring residential uses. Paragraph 187 of the NPPF is clear in this regard and states: "Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed."</p>	<p>If an existing use is causing issues with neighbouring residents' areas, there are provisions within other, non-planning legislation to address this. This does not justify losing a site from employment use. The policy looks to control new development, and this will be clarified through amendments to the policy.</p> <p>Whilst we accept some of our employment sites are relatively close to existing homes, in the main they are separate from main residential areas and therefore do not cause too much trouble. These supports protecting the employment areas so they we can retain places for potentially 'bad neighbour' employment uses to locate.</p>	Add new section 3 to Policy BAAP14, as follows: Where new residential development is proposed adjacent or close to existing employment or industrial activity, then it is the responsibility of the applicant of the residential scheme (as the 'agent of change') to provide suitable mitigation to ensure there will be no significant adverse impacts.
Eskmuir Securities Ltd	General	Eskmuir note the definition provided to 'Business Park' within the glossary. In line with the wider comments from Eskmuir, we suggest the definition be amended to allow greater flexibility across allocated employment sites, including Kingfisher Business Park, for the reasons previously noted.	Noted and changes made	To reflect the changes to policies BAAP13 and 14, this will be amended to '.... general industry, storage and distribution and other limited employment generating uses.'
Eskmuir Securities Ltd	General	Eskmuir note the intention to replace current policies but reiterate this is a key opportunity to introduce sufficient flexibility into the new policies so as to support and enable economic growth within Bootle and beyond.	Noted	see above
Eskmuir Securities Ltd	General	Eskmuir note map allocation map and its recognition of Kingfisher Business Park. In doing so, this must be read in conjunction with all previous comments.	Noted	See above

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Resident	General	<p>There have been significant “Improvements” already in the area concerned. Unfortunately, where there were factories and workplaces now there are houses. It would be hard to understand, how there could be any homeless in the area if local people on the Council housing list were given the priority they should be.</p> <p>One also wonders how many of these new properties are fully paid up rent-wise, by the tenants and not by the W&P or other social organisations.</p> <p>The road system has greatly deteriorated by design. It appears the traffic calming, and road narrowing contribute the town's carbon footprint with traffic stationary with engines running, with belching out exhausts. I believe some of the traffic calming have drivers concentrating on them rather than observing pedestrians, particularly the very younger, movements. The wonderful wide boulevards have disappeared in Bootle.</p> <p>The New Strand is an asset which needs to be thought out better. Most of the shops have been priced out of the Centre, only to be replaced by community shops and offices. I believe there needs to be greater effort to encourage retailers back.</p> <p>There needs to be more seats spread out through the borough to encourage walking. This is a good way for the older population to keep fit, but this is difficult if there are no occasional places to rest along the way. I know there is a problem with vandalism, but this is another problem to be solved. Difficulty protecting your assets should not be an excuse for not having them.</p>	<p>Evidence would suggest that Bootle doesn't have a quantitative need for new affordable housing but has a need for new quality affordable housing stock and affordable housing with 1 or 2 bedrooms.</p> <p>How rent is paid is not a planning issue.</p> <p>Traffic calming measures are outside the control of planning. However, Policy BAAP8 seeks to 'support the easy, safe and pleasant movement of people by walking and cycling, on public transport and in the car' through the identification of key routes within and through Bootle.</p> <p>Plans are underway for the regeneration of Bootle Strand. However, as with many centres, Bootle have lost many retailers due to the changing nature of how people shop. Whilst the Council would support appropriate new shops in the centre, we have to plan for the reality that centres need to provide a wider function than just shopping.</p> <p>Point noted re additional seats. Policy BAAP24 seeks to secure contributions towards environmental improvements, and this could include street furniture such as new benches.</p>	None
National Highways	BAAP3 Bootle Central Area	<p>National Highways' primary focus is on ensuring the continued safe operation of the 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.</p> <p>As such, we are supportive of plans that aim to deliver local employment opportunities that can be accessed via public transport or active travel routes. In particular, the proposed reuse of vacant office space in policy BAAP3 would help to keep trips local.</p>	Noted.	None
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.	Comment noted.	None
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.	Comment noted.	None

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National Highways	General	In terms of impacts to the SRN, 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 master planning or pre-application contact on individual sites would be the most appropriate time to accomplish this.	Comment Noted. Local Plan policy IN2 Transport will remain in place and addresses this issue.	None
Mersey Forest	General	It is recommended that the Bootle Area Action Plan refers to the Mersey Forest Plan, drawing particular attention to policy covering the Action Plan area: S1. Urban areas, settlements, and employment sites: Plant individual trees, groups of trees and small woodlands on appropriate and available urban areas, settlements, and employment sites, such as school playing fields, open spaces, streets, highway verges, in the grounds of large institutions, derelict land, and development sites. Target planting to meet identified green infrastructure needs. Incorporate habitats and tree planting in new development as part of the statutory planning process. Planting should contribute to the GreenPrint for Growth in North Liverpool/South Sefton. The Mersey Forest Plan also has indicative woodland cover targets that show the total net woodland in each area, for the Bootle area this is 10%. The current estimate of tree canopy cover for the Bootle AAP area is 3.7%.	Agree in part. The planting of trees as advocated in the Mersey Forest plan does not need planning consent to be realised. This is a non-statutory plan, alongside a range of other such plans produced by various partners and organisations across the Plan area, and it is not possible or desirable to refer to all of these specifically. However, there are sections/policies of the AAP that could refer to the need for more tree cover, which is in line with the Mersey Forest Plan aspirations. In practice, BAAP1 Design, BAAP11 Parks, Public Open Space and Playing Fields and the environmental improvements priorities under policy BAAP24 can also help to achieve LCR and Sefton green and blue infrastructure priorities.	Amendments will be made to the AAP to emphasise the need to protect and enhance landscaping and green and blue infrastructure (including trees) and to refer to the Mersey Forest where appropriate.
Mersey Forest	General	It is also important to acknowledge the Liverpool City Region Green Infrastructure Framework, prepared by The Mersey Forest, which covers Sefton and assists in the development of green infrastructure in the area.	This is a non-statutory Framework plan, alongside a range of other such plans and Frameworks produced by various organisations across the Plan area, and it is not possible or desirable to refer to all of these specifically. In practice, BAAP1 Design, BAAP11 Parks, Public Open Space and Playing Fields and the environmental improvements priorities under policy BAAP24 can also help to achieve LCR and Sefton's green infrastructure priorities.	None.
Mersey Forest	General	Other tools and resources include Natural England's Green Infrastructure Framework Principles and Standards for England, which comprises of the standards for green infrastructure quantity and quality supported by datasets. There are five headline standards for green infrastructure, including the Urban Greening Factor Standard (S4) and Urban Tree Canopy Cover Standard (S5).	Noted. Natural England's Green Infrastructure Framework Principles and Standards can help inform relevant corporate strategies and documents and environmental improvement priorities under policy BAAP24, but it is not considered appropriate to fix Bootle-specific standards in this AAP. In practice, BAAP1 Design, BAAP11 Parks, Public Open Space and Playing Fields and the environmental improvements priorities under policy BAAP24 can also help to achieve LCR and Sefton green infrastructure priorities.	None

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NHS Property Services	BAAP10 Healthy Bootle	We are pleased to note that the Bootle Area Action Plan does acknowledge health inequalities in the area and seeks to address these in the Policy BAAP10 Healthy Bootle. We would advise that this policy is bolstered further by reference to the need for developer contributions towards the provision of healthcare infrastructure to ensure the health and wellbeing of local communities.	It is assumed that the reference to developer contributions is in relation to new housing development. Despite the expectation that c1,500 homes could be built in Bootle to 2040 (many of which already have consent) this does not necessarily equate to a population increase. In the context of the town the size of Bootle, this is very modest level of housing growth (<0.5% pa). If evidence can be provided that new or expanded health facilities are justified by this level of housing growth, then this may be something that could be considered through s106. reference in the policy will be made to support the principle of new health facilities.	Add in: Supporting in principle the provision of public health facilities (subject to other BAAP and Local Plan policies)
Historic England	General	Thank you for consulting Historic England on the above document. At this stage we have no comments to make on its content.	Noted	None
Peel Ports	General	It is acknowledged that the area covered by the BAAP has been expanded since the Issues and Options consultation stage to include land to the west of Rimrose/Derby Road, which is stated as being outside the operational port area. The additional land is shown in Figure 1 of the draft BAAP. It is confirmed that this land does not sit within the operational port area. However, MDHC would welcome early engagement in any discussions regarding proposed land uses within this area, being mindful of the 'agent of change' principle within the NPPF.	Comment noted about expanded area and confirmation that this sits outside Port Operational area. The Council would always raise any 'agent of change issue' on planning proposals, including those that sit next to employment areas.	None
Peel Ports	Section 2	The previous representations submitted in response to the Issues and Options consultation referenced the fact that the SWOT analysis only recognized the Port as a Weakness and Threat. It was suggested that it should also be acknowledged as a Strength and an Opportunity in the emerging BAAP. The BAAP has several references to the negative impact of the Port, namely para 2.33, summary of issues (pg22), para 5.135	Whilst the Port does have economic benefits to the regional and sub regional economy, the environmental impact on Bootle's residents can be quite negative. There is a local perception that the quality of life of Bootle's residents is secondary to economic growth. As this is an Area Action Plan for the Bootle area, it is right that these issues are highlighted and approaches to mitigation prioritised.	None
Peel Ports	BAAP12 Employment Land Provision	Acknowledging the reference to the Port of Liverpool providing a "significant source of employment land and jobs" in part 11 of draft Policy BAAP12, it is still considered that the BAAP fails to recognise the strengths and opportunities of the Port. For example, the response to the Issues and Options consultation provided a detailed summary of the Peel Ports Scholarship Programme at The Hugh Baird College, which provides local residents with key training that will provide them with skilled jobs and a good career trajectory. However, paragraph 2.8 of the draft BAAP fails to acknowledge this strength and opportunity as a direct result of the Port. It states "Hugh Baird College provides further education including vocational and academic courses, including degrees. In recent years Sefton Council has led the way in providing a number of apprenticeships in a range of service areas." It is suggested that the education and employment opportunities are acknowledged within the final version of the BAAP, and that "Young People" is added to the list of bullet points in the opening infographic of Chapter 3.	Comment noted. Reference to the Peel Ports Scholarship Programme will be included. The bullet list at the start of Chapter refers to what was suggested as possible inclusion in a vision at Issues & Options stage. This can't be retrospectively changed.	Sentence changed to: Hugh Baird College provides further education including vocational and academic courses, including degrees, and works with local employer partners such as Peel Ports, through their Scholarship Programme, the Sovini Group, and the NHS.

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Peel Ports	Section 2	It is considered that the BAAP fails to recognise the significant steps that have been taken to reduce the carbon footprint of operational port activity, as set out in paragraph 2.12 and Appendix 1 of the response to the Issues and Options consultation. It is therefore suggested that the final version of the BAAP acknowledges and supports the continued decarbonisation of the port and maritime industry, rather than only referring to it as an "issue", "hazard", or "challenge".	Agree in part. Whilst the port may have made good progress to reduce the carbon footprint within the operational port area, Bootle does still have the issue of heavy port traffic and some other pollution issues (e.g. noise, odour). However, the summary of issues will refer to employers and businesses rather than singling out the Port and the need to maximise economic benefits.	Change summary of issue to <ul style="list-style-type: none"> Engage with major employers and businesses to maximise economic benefits of their activities, whilst protecting Bootle from any significant environmental impacts.
Peel Ports	BAAP14 Limiting the Impact of Industry on Residents	Draft Policy BAAP14 relates to limiting the impacts of industry on residents. Part 2 of the draft policy states "Any identified impacts on residents (significant or otherwise) from new or intensified uses on employment sites must be eliminated or reduced or mitigated to acceptable levels." Paragraph 188 of the NPPF requires that the focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). It is considered that this policy would fail the test of soundness set out in Paragraph 35 of the NPPF, which includes that policies are effective and consistent with national policy. Proposed Policy BAAP14 is not effective, as it fails to recognise the development and intensification of uses permissible within the operational port area via permitted development rights. It is also considered that proposed Policy BAAP14 is not consistent with national policy, because it fails to take account of the agent of change principle and guidance referenced in paragraphs 187 and 188 of the NPPF, respectively. Accordingly, it is recommended that the policy is amended such that it applies only to new development (wording provided).	Development under planning legislation is by definition new and includes both new build development and changes of use. Changes to activities which are not development are beyond the scope of this policy. The proposed wording 'new development' is not helpful. The Port is outside the Action Area Plan area and therefore BAAP14 does not apply to the operational Port area. The Local Plan remains the development plan for the Port. Planning applications in the Port will be assessed against the policy framework set out in the National Planning Policy Framework, Northwest Marine Plan (if relevant) and the Local Plan, rather than the Bootle Area Action Plan. In addition, a new section to policy has been added to clarify the agent of change responsibility.	Add to part 1 of the policy that: 'This does not apply to proposals that are allowed under permitted development rights'. Change part 2 of Policy to 'Any proposal for development on employment sites that will have unacceptable impacts on the amenity or health of residents must be eliminated or reduced or mitigated to acceptable levels'. New Section 3 to policy - '3. Where new residential development is proposed adjacent or close to existing employment or industrial activity, then it is the responsibility of the applicant of the residential scheme (as the 'agent of change') to provide suitable mitigation to ensure there will be no significant adverse impacts.'
Peel Ports	BAAP12 Employment Land Provision	Paragraph 5.121 acknowledges that land between Regent Road and A565 (site BE5) is land primarily in employment use that is adjacent to but outside the operational Port area. It primarily includes land between Nelson Street and Dacre Street, plus other sites further north that front the A565 (i.e. Derby Road and Rimrose Road). This area includes a mix of uses, including businesses that benefit from being adjacent to the neighbouring Port and some retail uses that front the A565, including Go Outdoors. This area was not identified as a separate employment site in the Sefton Local Plan but instead is included as part of the Port and Maritime Zone in Sefton Local Plan policy ED1. The draft BAAP states that whilst employment uses that are not port related will be acceptable in principle, they must not compromise the Port or port-related activities in the wider Port and Maritime Zone (as identified on the Sefton Local Plan). MDHC supports the employment allocation at BE5 and welcomes the protection of the Port and port-related activities.	Noted	None
HBF	General	The HBF supports that Council in including an objective that looks to meet the housing needs of Bootle's residents in a way that is safe and secure including affordable and aspirational housing, homes for families, older people, and people with special needs.	Noted	None

Who responded	Policy Commenting on	Summary of comment	Council Response	Changes to AAP
HBF	BAAP2 Best Use of Resources	<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 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 Northwest, 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>	<p>While this is noted, the Council considers that there are also income-related reasons for securing water efficiency, given that water meters are mandatory in new housing development, and that most of the Bootle Area Action Plan area is within the 10% most deprived areas nationally. This is true for multiple deprivation overall, and in relation to income and health & disability indicators. The Council's recent Public Health Annual Reports indicate that Linacre ward has the highest rates of poverty affecting older adults. Almost half of older adults are affected (46%). This is three times higher than the national average. The Council also notes the support of United Utilities for this standard and their provision of evidence to justify this (see below).</p>	None
HBF	BAAP17 Affordable Housing and Housing Mix	<p>This policy states that housing developments that provide 15 dwellings or more should provide a minimum of 15% of the homes as affordable housing. It goes on to state that 33% of the affordable housing should be affordable or social rented, 25% as First Homes and up to 42% as discounted homes for sale.</p> <p>This differs slightly from the policy for affordable homes in Bootle in the adopted Sefton Local Plan which states that affordable housing will be required as part of proposals for new developments of 15 dwellings or more on the basis of 15% of the total scheme (measured by bedspaces), and that the affordable housing should be 50% social / affordable rented and 50% intermediate housing.</p> <p>The HBF considers that the policy provided in the Area Action Plan provides greater clarity than the adopted policy and is more in line with Government policy which looks for First Homes to be provided. However, without viability evidence it is not possible to confirm whether this policy would be appropriate or sound. 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 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.</p>	<p>Agree in part. The Council will commission a viability assessment of the Bootle Area Action Plan, looking at a number of the allocated sites in the Local Plan. A number of the large housing allocations already have approval, and these are generally for 100% affordable housing. We know that viability is often a challenge in Bootle, but we do also want to take opportunities to secure affordable housing were possible.</p> <p>It is possible to lose the AH requirement due to viability issues. Whilst this could be seen as time consuming, the reality is that this will only apply to a very small number of proposals in the Bootle area (probably <5 to 2040) so the Council do not think that this would be onerous.</p>	None to date but will be informed by the viability work.
HBF	BAAP17 Affordable Housing and Housing Mix	<p>The NPPF is also clear that where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership. The HBF is concerned that the proposed policy will not deliver this requirement, if this is to be the case the HBF recommends that the Council provide the appropriate evidence.</p>	<p>The policy asks for 15% of the scheme to be affordable, and of these, two thirds will be available for affordable home ownerships homes (25% First homes and 42% discounted market homes). This means that 10% of the total number of homes on a scheme will be available for affordable home ownership</p>	None

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HBF	BAAP17 Affordable Housing and Housing Mix	<p>The policy also states that on schemes that provide 25 new build homes or more of any tenure that a set mix of homes will be required this includes 25% of market housing being 1-2 bedrooms and 40% being 3-bed.</p> <p>The HBF understands the need for a mix of dwelling types 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 additional evidence. The HBF considers that the Council should also ensure that the mix reflects the market demand and aspirations of the local community.</p>	<p>It is considered that the policy provides a very flexible approach to housing mix, whilst trying to ensure that a reasonable supply of smaller homes is provided. The most recent SHMA suggested the current Local Plan policy remains valid and BAAP17 reflects this approach. If a developer wishes to provide more smaller homes, they can do. However, the policy also allows up to 35% of the homes to be larger homes (4+ bedrooms) if this is needed to assist with viability or to meet a greater need for larger homes.</p>	None
HBF	BAAP17 Affordable Housing and Housing Mix	<p>The policy also states that all homes should be designed to meet building regulations M4(2), and that on schemes of 50 or more dwellings a minimum of 5% of the homes should be designed to meet M4(3) 'wheelchair user' homes. This differs from the Local Plan which states that in developments of 50 or more dwellings, at least 20% of new market properties must be designed to meet M4(2) standards.</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.</p> <p>PPG identifies the type of evidence required to introduce such a policy, 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 & 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 PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances, this is not just in relation to the ability to provide step-free access.</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 implemented in due course through the Building Regulations. M4(3) would continue to apply as now where there is a local planning policy 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>Recent evidence to support the Liverpool City Region Spatial Development Strategy included a Housing Needs Assessment. This identified a significant need for wheelchair homes across the city region and in Sefton - some 8,500 homes in Sefton by 2040. The assessment suggested a possible requirement of 10-15% of all new market homes to meet the M4(3) standard and one third in the affordable sector. This is similar to the Council's own most recent assessment (from 2019) that suggested that 10% of new homes should be secured at M4(3) standard.</p> <p>The Council acknowledge this would be challenging, particularly in the Bootle area, so has set a lower target. As with affordable housing (see above) the Council will assess this policy in a viability appraisal.</p> <p>It is noted about the government's intent to make M4(2) mandatory with a few exceptions. At this point the policy will remain unchanged, but this section (section 10) will be removed if and when the government confirms the policy.</p> <p>Both sections 10 and 11 will include that exceptions may apply to these requirements, as per government guidance.</p>	<p>For sections 10 and 11 add: '... or where site specific factors such as vulnerability to flooding, site topography, and other circumstances may make a specific site unsuitable.'</p> <p>Include overview of evidence for the need for M4(2) and M4(3) dwellings in the explanatory text.</p>

Who responded	Policy Commenting on	Summary of comment	Council Response	Changes to AAP
HBF	BAAP24 Environmental Improvements	<p>This policy states that all residential developments that create 10 dwellings or more should provide a proportionate contribution to environmental improvements in the local area. It goes on to state that the cost is set at £2,577 (2023/24 prices) per housing unit, which will be secured through a planning obligation.</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. Without appropriate evidence it is not possible for the HBF to determine if this policy viable or sound.</p>	<p>Most of the Bootle Area Action Plan area is within the 10% most deprived areas nationally. This is true for multiple deprivation overall, and in relation to living environment and income indicators. This makes it particularly important that local green space and the wider environment is of high quality. The local environmental came up as a key issues in many of the residents comments to the Bootle AAP and it is clear this is seen as a barrier to the success of the town. Any amount of money secured towards environmental improvements will be set at an arbitrary level (although informed by previous schemes) as it would not be possible or expected for new development to fund even a small proportion of the likely costs. Therefore, the Council has used the amount within its adopted Open Space SPD as this seeks monies on new developments for open spaces where none is provided on site. As we are not seeking new open spaces in Bootle (even when required by policy) it is considered a reasonable approach. It is considered the amount is low enough to be viable (although this will be tested in the viability assessment) but at a level to secure a meaningful pot to make a difference and potential to secure match funding.</p>	None
Homes England	General	<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, including the redevelopment of brownfield sites as a focus for urban living. Homes England will continue to work in partnership with Sefton Council to explore opportunities to support delivery of its local housing needs and ambitions, including those within Bootle.</p>	Noted.	None
Canal & Rivers Trust	Section 3	<p>The Trust considers that the Leeds to Liverpool canal could make a greater contribution to achieving the objectives/vision of the area and we welcome the numerous references and recognition of the canal within the draft plan.</p>	Noted	None
Canal & Rivers Trust	Section 3	<p>Within the opening sections to the document there are several references to the canal in terms of history, green infrastructure/open space and being the only body of water within the designated area. We welcome the recognition given to the canal corridor and the role it plays.</p>	Noted	None
Canal & Rivers Trust	Section 3	<p>In terms of section 3 and the high-level strategic objectives, the canal is not specifically mentioned, however a number of the objectives could be linked to the canal for example objective 4 in terms of safe and attractive walking and cycling; objective 10 to enhance green infrastructure and objective 12 in terms of high standards of design and to prevent crime and anti-social behaviour. We have no specific comments to make on the vision and objectives as currently drafted.</p>	Noted	None

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Canal & Rivers Trust	BAAP1 Design	<p>BAAP1 - Design — we welcome that this draft policy includes a whole section related to the canal corridor under section 10. The key design principles listed here related to the canal include the matters that we try to promote and adherence to these should create enhanced waterside places. The only addition which we would welcome being included within the listed requirements relates to structural integrity. For example, including the wording “new development should be sited to ensure no detriment is caused to the structural integrity of the canal infrastructure.”</p> <p>Section 11 also refers to the production of a design code and that the development adjacent to the canal should adhere to those place making principles. We note that paragraph 5.12 set out that the design code is being consulted on alongside this document, however it does not seem to be available. We would wish to review this design code where it relates to the canal, so that all the benefits of developing and living near water can be teased out and realised.</p>	Suggested amendment (with minor wording changes) to be made. The Design Code is likely to be available alongside the Publication Draft Bootle Area Action Plan.	Include the wording: <u>New development should be sited to ensure there are no detrimental impacts on the structural integrity of the canal infrastructure.</u>
Canal & Rivers Trust	BAAP4 Bootle Town Centre	<p>BAAP4 - Bootle Town Centre — includes the Bootle Strand site which includes the canal corridor (as shown in figure 6). The policy sets out a need for a masterplan and that this should include the creation of 'canal side public space that is suitable for events/festivals'. It is presumed that would be the site which currently has the meanwhile use on (which is hinted at paragraph 5.37). We note the indicative artist impression which is shown at figures 8 and 9 which show a vibrant and activated waterside space. The Trust would wish to be engaged in relation to the masterplan where it relates to the canal corridor.</p>	Noted.	None
Canal & Rivers Trust	BAAP8 Getting Around	<p>BAAP8 - Getting Around - this policy sets out principles such as encouraging walking and cycling and enhancing existing routes. Under point (3) this sets out future investment for measures including “ improved access for all to the canal towpath with clear information on its route and access/egress points “.</p> <p>Paragraph 5.91 of the supporting text to the policy notes that improving access to the canal towpath represents a real opportunity as the canal provides a flat, traffic free route and links communities. We welcome this recognition and figure 14 which includes the canal as a 'priority route, with a number of 'priority access points' shown.</p> <p>This seems really positive, however significant improvements would be required to enable the canal corridor to be accessible to all users. For example, the bridge adjacent to the Lock 6 Quad access is cobbled and not designed for disabled access. The towpath crosses the canal at this location and crosses back over at Stanley Road where more alterations would be required. The condition of the towpath is also beginning to deteriorate all along this section with sections of tarmacked towpath currently breaking up in many areas. Improvements would also be required at existing towpath access points to make them acceptable for all users. There is a clear synergy here with draft policy BAAP24.</p>	Noted. This is more of a delivery/ implementation issue than a policy issue. However, as mentioned, Policy BAAP24 could provide a potential source of funding for improvements to canal access.	None.
Canal & Rivers Trust	BAAP9 Nature	<p>BAAP9 - Nature - the policy sets out that all major development from November must meet the requirements of Biodiversity Net Gain (this of course has now been temporarily postponed until the New Year).</p> <p>We welcome the intention that even sites under the threshold will still have to take opportunities to "improve wildlife corridors". This would be a positive as the canal corridor is a key wildlife corridor within the plan area, we would welcome engagement in relation to potential improvements that may be possible along the canal corridor.</p>	Noted and update proposed. Support noted.	Amend part 1 of policy to: All applicable development proposals must demonstrate that they are meeting the legal requirements of the Environment Act 2021 regarding Biodiversity Net Gain.

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Canal & Rivers Trust	BAAP11 Parks, Public Open Space and Playing Fields	BAAP11 - Park, Public Open Space and Playing Field — the policy seeks to protecting these areas and based on the figure 16 this shows that open space includes the canal corridor. The general thrust and approach of the policy seems acceptable. We would not however want such 'protection' to prevent our ongoing maintenance and operational management of the waterway and associated infrastructure	It is not the intention of the policy to hinder management and maintenance of canal-related infrastructure. The policy states these sites 'will be protected from new development except for development necessary for the continued use and improvement of the site for its current use'.	None
Canal & Rivers Trust	BAAP20 Hawthorne Road/Canal Corridor Regeneration Opportunity Area	BAAP20 — Hawthorne Road/Canal Corridor - this policy relates to the allocation of the site. This policy covers several sites, some of which have a canal boundary as shown in figure 18. We note that a masterplan will be prepared to support the development of these opportunity areas and we would welcome being consulted on this further. We welcome that criteria 7 notes that where development is adjacent to the canal that it should accord with the principles under policy BAAP1 (Design) and the need to adhere to that policy.	Noted	None
Canal & Rivers Trust	BAAP23 Coffee House Bridge Regeneration Opportunity Area	BAAP23 - Coffee House Bridge - allocates the site for mixed use. The site includes the canal corridor as shown in figure 21 and as set out at paragraph 5.213 is located at an entrance to the canal and as such must enable good access and have a high-quality design. We welcome that this policy is linked to BAAP1 in terms of design and that this must be adhered to.	Noted	None
Canal & Rivers Trust	BAAP24 Environmental Improvements	<p>BAAP24 - Environmental Improvements — this policy sets out that development above a certain threshold must make a financial contribution towards environmental improvements and the monies will be used to secure environmental improvements lists under criteria (5). We note that this includes 'improving open space and improving priority routes.' As the canal corridor is regarded as open space within the plan and is recognised as a priority route (BAAP8) then this would enable a mechanism for funding to be secured for canal related environmental improvements. As a charity we would welcome and funding to enhance our waterways for the benefit of all users.</p> <p>Clearly access improvement to the canal will be critical as one of the main barriers to inclusive use of the canal is access points for wheelchairs, pushchairs, and mobility aids etc. Adapting these and also securing contributions to improving the towpath would be really beneficial in encouraging people to use the canal.</p> <p>We note that paragraph 5.224 sets out that the Council will consult on the strategy for how money will be spent. We would welcome being involved within this discussion.</p>	Noted.	None.

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Natural England	BAAP2 Best Use of Resources	<p>Tree planting: We advise that this plan policy includes a commitment to tackling Climate Change through building in the environment from the earliest stages of planning, for example through tree planting. As noted within paragraph 2.29 of the plan: “the area has some of the lowest tree cover in Sefton, mostly less than 2.5%”.</p> <p>Paragraph 131 of the NPPF states: “Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (...)”.</p>	<p>The interim sustainability appraisal of Bootle Area Action Plan identified the need to consider additional/amended bullet points in policy BAAP 1 Design, including in relation to climate change, cross-referencing policy BAAP2 (best use of resources) and the need to manage, mitigate or reduce flood risk and surface water and/or cross-refer to Local Plan policy EQ8. It also referred to the need for enhanced or appropriate green and blue infrastructure including landscaping and nature and appropriate design of external spaces. The Council intends to amend policy BAAP1 accordingly, and this will also provide the context for tree planting as part of landscaping.</p>	<p>The Council has amended policy BAAP1 'Design' to refer to climate change and the role of green and blue infrastructure in helping meet the challenge of climate change. New section: <u>'Development proposals should help mitigate and adapt to the impact of climate change by taking appropriate opportunities to protect and enhance green and blue infrastructure including soft landscaping and biodiversity and reduce surface water run-off rates and volumes and other sources of flood risk.'</u></p>
Natural England	BAAP9 Nature	<p>Recreational Pressure Management: We welcome the inclusion of section 3 within this policy to ensure recreational pressure impacts to designated sites are mitigated and managed.</p>	Noted	None
Natural England	BAAP9 Nature	<p>The preparation and development of this Area Action Plan is a good opportunity to ensure that Sefton Local Planning Authority reflect Local Nature Recovery Strategies [LNRS]. These Strategies are an ambitious and strategic tool for nature recovery established by England’s Environment Act. Natural England views them as a new and exciting tool to identify ambitious nature recovery opportunities at a landscape scale across the whole of England</p> <p>The core purpose of LNRS is to help the reverse of the ongoing decline of biodiversity and nature. LNRS aims to help restore and connect habitats so that species can thrive; the process will ensure local partners collaborate to agree the priorities for the best activities and locations to inform local nature recovery. LNRS will consider opportunities to achieve wider nature-based solutions. The potential opportunities identified in these strategies can include actions to address other environmental objectives that are also positive for biodiversity for example river flood management and climate change mitigation through tree planting and peatland restoration.</p> <p>The LNRS will include a local habitat map and the identification of biodiversity priority areas to help focus action for nature recovery across the Liverpool City Region (LCR) and support the delivery of Biodiversity Net Gain. The LNRS can be used to target offsite BNG delivering valuable habitats in preferred locations for biodiversity and thereby helping to deliver the Nature Recovery Network.</p> <p>The Environment [Local Nature Recovery Strategies] [Procedure] Regulations 2023 [3] set out the role of Local Planning Authorities as ‘Supporting Authorities’ contributing to LNRS development. LNRS Statutory Guidance paragraph 7 states ‘All public authorities will also have to have regard to relevant local nature recovery strategies under the strengthened biodiversity duty.’. As a Supporting Authority Wirral Borough Council is encouraged to engage with Liverpool City Region Combined Authority as the responsible authority and contribute to the emerging Liverpool City Region LNRS. Local planning authorities must also ‘take account’ of any LNRS that relates to all or part of the local planning authority’s area.</p>	<p>Sefton Council is a 'supporting authority' in relation to the preparation of the LCR Local Nature Recovery Strategy and as such has a defined role and interest in the preparation of the LCR Local Nature Recovery Strategy.</p>	<p>Reference to the RNRS has been added to part 2 of the policy, '.... the Council will require developers to take opportunities for securing measurable net gains for biodiversity within the development <u>with regard to the Local Nature Recovery Strategy</u>'.</p> <p>The Council has amended the explanation to policy BAAP9 to refer to the linkages between biodiversity net gain and the Local Nature Recovery Strategy and other Sefton priorities.</p> <p>Change part 5, bullet 3 of Policy BAAP24 to: <u>enhancing nature taking account the Local Nature Recovery Strategy and other Sefton priorities</u></p>

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Amber Infrastructure Limited	BAAP3 Bootle Central Area	<p>Amber Infrastructure supports the objective to re-use and redevelop vacant office buildings and vacant/under-used land within the Bootle Central Area.</p> <p>We are in agreement that the regeneration of the Bootle Central Area will be a catalyst and the significant focus of investment and redevelopment in the next 15 years.</p> <p>Without such a policy there is a risk that areas of Bootle become blighted by vacant properties which would exacerbate problems already identified in the draft AAP e.g. fly-tipping and would result in issues attracting future investment.</p>	Comment noted	None
Amber Infrastructure Limited	BAAP5 Bootle Office Quarter	<p>As a key site within the Central Area, St John's House presents an opportunity for the sustainable redevelopment of a soon to be vacant site and more efficient use of land for alternative uses that can also promote regeneration and support the economic function of Bootle, such as residential and/or retail development.</p>	<p>St Johns House is identified as a good quality office building that the Council would look to offer greater protection for redevelopment to other uses. However, this building is now being demolished and St Johns House will be moved from part 2 of Policy BAAP5 and added to part 5 of policy BAAP5. In any case, Policy BAAP13 does allow for redevelopment of the protected office buildings if they are vacant, and it can be demonstrated that there is no demand for their reoccupation for office use. Policy BAAP13 will be amended to allow the 2 year period to include the period that notice to vacate was given.</p>	<p>Remove St Johns House (new) from part 2 of Policy BAAP2 and move to part 5.</p> <p>Changes to policy BAAP13 part1b as follows: The land/premises are currently vacant and have been continuously and actively marketed for the permitted uses for at least 2 years (starting either from the date the site became vacant or when prior notice of an intent to vacant the premises by the occupant was given) at a reasonable market rate (i.e. rent or capital values) and it has been demonstrated in a formal marketing report that there is no reasonable prospect of the site being used for the employment use identified in BAAP12.</p>
Amber Infrastructure Limited	BAAP5 Bootle Office Quarter	<p>A list of existing and former office buildings and vacant sites are included in draft Policy BAAP5, including the site of various office buildings that have now been demolished. We consider that it would be beneficial to include a plan of these sites in an Appendix to the AAP, to provide further clarity on their extent, particularly when referring to the sites of office blocks which are no longer present.</p>	Comment noted and agreed.	A new diagram showing the various offices blocks and sites covered by BAAP5 will be included.

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Amber Infrastructure Limited	BAAP5 Bootle Office Quarter	<p>The policy as currently worded protects certain office buildings within Bootle's Office Quarter with no clear methodology setting out the reasons for protecting some assets and not others. Amber Infrastructure considers that there is limited need to specifically protect employment uses at St John's House when the single-let building will be entirely vacant from early 2024 and the ability to lease or sell the space to another occupier has proved challenging to date. National Planning Policy Framework (NPPF, 2023) paragraph 122 states that planning policies and decisions need to reflect changes in the demand for land. This should be informed by regular reviews of both the land allocated for development in plans and of land availability. This is a key part of the NPPF which is missing from the draft AAP (Section 1). With reference to this requirement in national policy, it is unclear within the wording for Policy BAAP5 where the demand for employment land within Bootle, which would justify the protection of St John's House specifically, has been demonstrated.</p> <p>In addition, Planning Practice Guidance (PPG) states that in considering whether land should be reallocated for a more deliverable use the Council should consider whether changes of circumstance mean that take-up of the site for its intended use is now unlikely and whether there is evidence that the site has been actively marketed for its intended use for a reasonable period and at a realistic price.</p> <p>Given the marketing which has taken place at St John's House to date (as detailed in this letter), we consider that the Council should remove St John's House as a protected office site under draft Policy BAAP5.</p> <p>As a result of the above, we do not think that this draft Policy meets the soundness tests as set out in the NPPF, relating to ensuring plans are positively prepared (based on objectively assessed needs), justified and consistent with national policy (NPPF, para. 35).</p>	<p>Comment noted and agreed in part. Cross reference will be provided in the explanatory text to recently published evidence that supports the Liverpool City Region Spatial Development Strategy on employment land requirements (including office requirements) and how this informs the decision to protect some of Bootle's higher quality office accommodation.</p> <p>Policy BAAP13 will be amended to allow the 2 year period to include the period that notice to vacate was given. See response to earlier comment.</p>	<p>Amend Paragraph 130 and add new paragraph that follows: '130. The Liverpool City Region have recently published their draft Spatial Development Strategy (November 2023). This is supported by a Strategic Housing & Economic Development Needs Assessment (HEDNA). The draft Spatial Development Strategy identifies employment land and floorspace requirements for each of the constituent authorities. This includes a total minimum need for 6,700m2 floorspace for office and research & development to be available for future economic growth to 2040 in Sefton. The HEDNA also acknowledges that much of the existing office stock in the sub-region is poor quality and there is a need to protect the better quality stock and deliver new floorspace where it is viable to do so.</p> <p>130A. Bootle Office Quarter represents the largest cluster of office land and accommodation in the borough, and it is the aim of this plan to protect the better quality office buildings to provide choice of accommodation to meet future needs for Sefton. When the Inland Revenue vacate St John's House there will be approximately 8,400m2 of office accommodation to let in the protected in the Bootle office quarter.'</p>
Amber Infrastructure Limited	BAAP12 Employment Land Provision	<p>The draft AAP recognises that once HMRC vacate St John's House this will result in vacancy of 5% of the protected office space in the Office Quarter. This is incorrect as St John's House comprises 7,990 sq. m, which is c. 19% of 42,300 sq. m. This links to Draft Policy BAAP3, as detailed earlier in this letter, which identifies the issues associated with vacant office stock and the need to bring vacant sites back into use. We agree that vacancy rates need to be tackled and therefore having nearly a fifth of the protected office stock as vacant (in the form of St John's House) will not address the problems which Draft Policy BAAP3 seeks to address.</p>	<p>Comment noted. It is proposed to remove this sentence from the policy and include similar text in the explanatory text. This will reflect the updated figures as suggested in the response and will link to the evidence on the need for office accommodation.</p>	<p>New paragraph under Policy BAAP5 Bootle Office Quarter represents the largest cluster of office land and accommodation in the borough, and it is the aim of this plan to protect the better quality office buildings to provide choice of accommodation to meet future needs for Sefton.</p>

Who responded	Policy Commenting on	Summary of comment	Council Response	Changes to AAP
Amber Infrastructure Limited	BAAP13 Protection of Employment Land	<p>Policy BAAP13 as currently drafted requires a marketing period of at least 2 years to be undertaken starting from the date of vacancy. Amber Infrastructure consider that there should be no stipulation on when the marketing period can commence. As many occupiers are required to provide notice that they will not be renewing their lease marketing periods often commence before a building is fully vacant, as is the case with St John's House.</p> <p>7</p> <p>Therefore, the Council's policy regarding marketing should reflect this and allow the marketing of buildings prior to vacancy to be counted within the requisite marketing period.</p> <p>The adopted Sefton Local Plan (2017) requires a 12 month marketing period to be evidenced for employment sites being considered for alternative uses. This has been increased within the draft AAP policy; however, no evidence has been provided to demonstrate the need to double this time period.</p> <p>We therefore consider that the requirement to market office sites for 24 months, and specifically the requirement for this period to commence upon vacancy, have not been justified within the draft AAP and therefore do not meet the tests of soundness as required by the NPPF.</p>	<p>Agree in part. Whilst the Council would like to retain the 24 month period for marketing, we do appreciate that premises can be marketed during a period of notice being served. Therefore, the policy will be amended to allow the 2 year period for marketing to commence when notice is given that a lease is not being renewed and the accommodation will become vacant - rather than when vacancy occurs. It will be up to the applicant to demonstrate, in a formal marketing report, that the marketing commenced prior to the previous occupants leaving and how.</p> <p>The period from the LP is being increased from 12 to 24 months due to the difficulty in delivering new employment premises which indicates the need to protect those already in place.</p>	<p>Update part 1b to: The land/premises are currently vacant and have been continuously and actively marketed for the permitted uses for at least 2 years (starting either from the date the site became vacant or when prior notice of an intent to vacant the premises by the occupant was given) at a reasonable market rate.</p>
Amber Infrastructure Limited	BAAP12 Employment Land Provision	<p>The St John's House site represents an opportunity to deliver sustainable development in a highly accessible location, securing a number of economic, social, and environmental benefits. In broad terms, as shown in Appendix 1, it is considered that the existing 4.52 acres could be redeveloped for residential development, given the surrounding residential character of the area, delivering approximately 150 high-quality new homes in a mix of new build apartment blocks (maximum 4 storey blocks in-keeping with surrounding context), new build terraced properties and the retention and conversion of part of St John's House.</p> <p>Alternatively, or as part of a mixed use development with residential uses, the St John's House site also presents opportunities for retail development in the form of a small supermarket or comparison goods store with associated car parking, to create local employment opportunities and enhance the retail offering with the local area; complementing, rather than competing with, the redeveloped Bootle Strand.</p>	<p>The policy does allow for alternative uses if can be demonstrated that there is a lack of clear demand for office accommodation over a 2 year period. Alternative uses will be assessed on their merits at that time. The Council can demonstrate a robust supply of housing land so does not need to promote land and premises needed for employment for housing.</p> <p>Retail development is likely to be more problematic in any case at this is an out-of-centre location.</p>	None
Sport England	BAAP11 Parks, Public Open Space and Playing Fields	<p>Sport England do not consider that the draft policy is in accordance with paragraphs 98 and 99 of the NPPF. The first part of the draft policy sets out the Council's approach to protecting existing parks, public open space and playing fields. It states that "All existing parks, open spaces and playing fields in the area, identified on the policy map, will be protected from new development except for development necessary for the continued use and improvement of the site for its current use". The draft policy does not refer to the three circumstances whereby development on playing fields is considered acceptable in national policy (as referred to above). This part of the policy is therefore considered to be in conflict with national policy. Sport England consider that the draft policy should be reworded in accordance with the NPPF paragraph 99.</p>	<p>The Council considers that there is specific evidence to justify the approach in part 1 and has amended the explanation to refer to both this evidence and to justify and say why the Council would resist proposals which would involve compensatory provision, even within the plan area, or proposals for alternative sports and recreational provision. The Council does not consider that no net loss of quantity, quality and accessibility could be achieved and feels that its sports and open space assessments do not show open space or outdoor sports facilities in Bootle to be surplus to requirements.</p>	Changes made to the explanation to the policy, to justify and support the Council's approach.
Sport England	BAAP11 Parks, Public Open Space and Playing Fields	<p>The wording of the currently drafted policy is problematic in a second respect. The phrase "development necessary for the continued use and improvement of the site for its current use" is not specific enough. The PFG sets out in detail the five exceptions for when development on a playing field is considered acceptable (in line with the three circumstances set out at paragraph 99 of the NPPF). The drafted policy does not provide any detail on the circumstances of development that is "necessary".</p>	<p>The Council considers that there is specific evidence to justify the approach in part 1 and has amended the explanation to refer to both this evidence and to justify this.</p>	Changes made to the explanation to the policy, to justify and support the Council's approach.

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Sport England	BAAP11 Parks, Public Open Space and Playing Fields	<p>Thirdly, the policy only protects those areas identified on the policy map. The policy map for the local plan does not include any school playing field sites. This policy would not therefore afford these playing fields any degree of protection. Nor would the policy afford any protection to any newly created areas of playing field, public open space or parks or any important areas that may have accidentally been omitted from the policy map. It is considered that the draft policy be reworded in this respect to ensure that areas not named on the policy map are also afforded protection.</p> <p>The third part of the policy relates to how investment for existing parks, public open space and playing fields is secured. This directly relates to Policy BAAP24. For reasons set out below, this part of the policy is not considered to be in accordance with paragraph 98 of the NPPF.</p> <p>In summary, the first part of the policy should be redrafted in accordance with the NPPF paragraph 99, and the third part of the policy should be redrafted in accordance with the NPPF paragraph 98.</p>	<p>This policy protects the areas shown on the policy map. However, school playing fields will be continued to be protected under Local Plan policy HC7, NH5 and relevant national policies. A sentence in the explanatory text of Policy BAAP11 will be included to explain this. Two school playing pitches (Hillside High and Pennington Road) are shown as greenspace under Policy 11 as the Council see these as requiring the additional protection this policy warrants. Hillside playing pitches provide one of the few clusters of playing fields in Bootle. The small playing fields at Pennington Road provides a play area for a number of nearby primary schools which do not have their own on-side space.</p>	<p>Add new sentences to explanation to BAAP11: In addition to these sites, a number of schools playing fields are located within the Bootle AAP area. These will be continued to be protected through Local Plan policies HC7 ‘Education and Care Institutions’, NH5 ‘Protection of Open Space and Countryside Recreation Areas’ and through relevant national guidance and policies. Two sites designated as Education Institutions in the Local Plan (playing fields to the north of Hillside High School and Pennington Road playing fields) have been included for protection in this policy as the Council see these as warranting the greater protection this policy accords.</p>
Sport England	BAAP24 Environmental Improvements	<p>This draft policy sets out the approach for dealing with offsite financial contributions. It is referred to in the policy as an “environmental improvement contribution”. Part 5 of policy sets out the types of contribution sought. This includes “improving local parks, open spaces and playing fields”. The supporting text to the policy sets out that at paragraph 5.224 that “In advance of the adoption of the Bootle AAP and the implementation of this policy, the Council will consult on and publish a strategy for how and where money raised through this policy will be spent and how it will be supported through other funding”. Reference is also made in the justification text to the cost of the environmental improvement (set out in part 2 of the policy) as being based on the current cost of open space provision as set out in the Council’s Open Space SPD.</p> <p>As set out at paragraph 98 of the NPPF, any policy approach to protecting and providing sport and recreational facilities should be informed and underpinned by a robust and up to date needs assessment. For Sefton this is provided by the Sefton Playing Pitch and Outdoor Sports Strategy (PPOSS) (adopted by the Council in June 2023). This reviews existing provision across the plan area looking at pitch type, usage, and condition for the following sports: bowls, cricket, football, hockey, rugby union, rugby league and tennis. It provides a clear strategic framework for the maintenance and improvement of existing facilities with future demand projected up to 2030. It also sets out a recommended approach for developer contributions, 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. Also of specific relevance to the draft AAP are the area specific recommendations for Bootle which are set out in part 6 of the document.</p> <p>No reference is made in this policy to the PPOSS, or any evidence based approach. It is unclear from the policy and justification text which projects will be prioritised for and how this will be assessed. It is critical that the AAP policies for sport and recreation are based on the recommendations and findings of the PPOSS. As currently drafted the policy is not considered to be in accordance with the NPPF, specifically paragraph 98.</p>	<p>The Council considers that there is specific evidence in both the 2023 Playing Pitch and Outdoor Sports Strategy and the 2015 Open Space and Recreation Study - brought together and analysed in a topic paper - to justify its approach and has amended policies BAAP11 and BAAP24 and their explanations to refer to both this evidence and to justify its approach. The Council considers that the revised policies and explanations and evidence, justify why it is taking its currently approach, and set it within the context of and broad conformity with the Dec 2023 NPPF paragraphs 57, 102 and 103.</p>	<p>Changes made policies BAAP11 and BAAP24 and their explanations, to justify and support the Council's approach.</p>

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Sport England	BAAP1 Design	Sport England support the emphasis given in the draft policy to the canal corridor. Canals and their towpaths provide opportunities for recreational physical activity and active travel. This is consistent with Sport England's overarching strategy Uniting the Movement and AD3. Principle 3 of AD3 contains further detail on specific measures that could be included in respect of the canal corridor (e.g. wayfinding, connection with the wider area). It is also considered that greater reference to active design could be incorporated into the general part of this policy which would ensure the policy better addresses the AAPs vision of Bootle and the objective of making Bootle a healthier place to live (Objective 11 of the AAP). Active design contains 10 principles based around three themes (supporting active travel, achieving high quality places and spaces, and creating and maintaining activity). Sport England would encourage further consideration is given to these principles and themes in the draft policy.	Noted. The Council considers that policy BAAP1 'Design' and the National Design Guide form an acceptable basis for assessing planning applications in the Plan area. These incorporate the key principles of Active Design.	None
Sport England	BAAP2 Best Use of Resources	There is opportunity to incorporate active design principles in this policy. For example, retrofitting requirements can include measures for supporting cycling and active travel (e.g., showering facilities and secure bike storage). Such measures to incentivise active travel can help reduce trips taken by car thereby reducing greenhouse gas emissions.	The Council considers that these measures would be provided under policy BAAP8 'Getting Around' and the 2018 Sustainable Travel and Development SPD (https://www.sefton.gov.uk/media/2950/sustainabletravel-spd-june-2018.pdf), if appropriate, rather than via policy BAAP2.	None
Sport England	BAAP4 Bootle Town Centre	Support measures for improving public realm and encouraging a mix of uses. This is in accordance with active design guidance. However, the parameters for the masterplan can be expanded on to include greater reference to active travel and appropriate design measures (e.g. cycling provision, linkages with public transport etc and further measures as included in AD3).	Agree. Will include a cross reference to the need to meet the requirements of Policy BAAP8 Getting Around.	Add to section 5: <ul style="list-style-type: none"> Improve the way people can access the centre in accordance with Policy BAAP8 'Getting Around'
Sport England	BAAP5 Bootle Office Quarter	As above, in order to encourage active travel in terms of commuting, office accommodation should provide good standard infrastructure (e.g. showering facilities, secure bike storage). This should also apply to BAAP6 Civic and Education Quarter and BAAP7 Local Shopping Parades (in respect of secure outdoor cycle parking),	The Council considers that these measures would be provided under policy BAAP8 'Getting Around' and the 2018 Sustainable Travel and Development SPD (https://www.sefton.gov.uk/media/2950/sustainabletravel-spd-june-2018.pdf), if appropriate	None
Sport England	BAAP8 Getting Around	Sport England fully support the emphasis given in the draft policy to active travel.	Noted.	None
Sport England	BAAP10 Healthy Bootle	Sport England fully support the policy in principle but suggest further consideration should be given to active design principles. The policy sets out criteria for helping people in Bootle to lead healthy, active lifestyles. Criterion iv. requires "protecting and securing investment in existing public areas, open spaces, parks, playing fields and the links between them, encouraging people to take physical exercise by providing opportunities for walking, cycling, outdoor recreation and sport". This is supported; however, it should be expanded to include wider uses, not just those spaces already used for physical activity. For example, active travel routes to places of work and education, retail etc are also critical in encouraging people to lead healthier lifestyles and embedding this in day to day life. Inclusion of the requirement for a Health Impact Assessment in the policy is fully supported.	The Council considers that parts 1 ii and 1 vii of this policy deal adequately with wider accessibility.	None
Sport England	BAAP12 Employment Land Provision	Bridle Road (BE9) is one of the sites designated for employment use under this policy. Bootle Football Club lies within the designation. In order to safeguard its use and allow for expansion of ancillary facilities as necessary, it is considered appropriate to remove the football club from the designation.	Noted and agreed.	Bootle FC's, Bridle Road ground will be designated as an open space on the Policies Map.

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Marine Management Organisation	General	<p>Please see below suggested policies from the Northwest Marine Plan that we feel are most relevant to your plan. We recommend considering reference to these policy areas within the supporting policy text. These suggested policies have been identified based on the activities and content within the document entitled above. They are provided only as a recommendation and we would suggest your own interpretation of the North West Marine Plan is completed.</p> <ul style="list-style-type: none"> • Climate change: NW-CC-1, NW-CC-2, NW-CC-3 • Infrastructure: NW-INF-1, NW-INF-2 • Water Quality: NW-WQ-1 • Air Quality and emissions: NW-AIR-1 • Social Benefits: NW-SOC-1 • Ports and Shipping: NW-PS-1 • Heritage Assets: NW-HER-1 	The Plan area does not include or abut any of the Sefton Coast or the operational Port, it covers only an inland area. So, it is unlikely that the NW Marine Plan or these specific policies will apply to much, if any, development in the AAP area. However, agree that it would be appropriate for the introduction to refer to the NW Marine Plan.	Add new paragraph in section 1 of the AAP to say: <u>"While the 2021 North West Marine Plan is a material consideration for consideration for any development affecting the area seaward of mean high water, the Bootle AAP area does not include any of the Sefton Coast or operational Port."</u>
Marine Management Organisation	General	The AAP makes no reference to the Marine Management Organisation or the relevant Northwest Marine Plan. We welcome the mention of the Northwest Marine Plan and any policies within the plan which you may deem as relevant. Under the Marine and Coastal Access Act, any authorisation or enforcement decisions must be made in accordance with the marine plan. Any other decisions which may impact the marine area must have regard to the relevant marine plan. Reference to the Marine Management Organisation and Northwest Marine Plan could be best placed in the Introduction of the document where you discuss planning policy context and the National Planning Policy Framework of which you need to have regard to.	The Plan area does not include or border any of the Sefton Coast or the operational Port, it covers only an inland area. So, it is unlikely that the NW Marine Plan or these specific policies will apply to much, if any, development in the AAP area.	see above
United Utilities	General	When preparing the AAP and future policies, new development should be focused in sustainable locations which are accessible to local services and infrastructure. We can most appropriately manage the impact of development on our infrastructure if development is identified in locations where infrastructure is available with existing capacity.	Noted	None
United Utilities	General	We note that the AAP includes a number of allocations. We would be grateful if you can provide GIS shape files for these locations so that the allocations can be assessed in more detail including any change in boundaries to the adopted borough wide development plan. In particular we note that the boundaries for the 'available land' for employment purposes are not confirmed within the consultation document and therefore we have not been able to provide you with specific comments on these sites.	Noted. These will be supplied to United Utilities as a statutory undertaker and 'Making Space for Water' partner.	None
United Utilities	General	Uuw notes that a number of your proposed allocations are not guided by site-specific policies e.g. the residential allocations listed under Policy BAAP16. 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.	We have committed to do a Masterplan for the Canal Corridor sites. This includes two the largest housing allocations. Most of the other sites have planning permission.	None.
United Utilities	General	Uuw notes that a number of locations are proposed to be the subject of a masterplan. Uuw requests the opportunity for early engagement with the council in the preparation of such masterplans.	Noted.	None

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United Utilities	General	<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. UUW will not allow building over or in close proximity to a water main. 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. Site promoters should not assume that our assets can be diverted. On occasion, an asset protection matter within a site can preclude the delivery of development.</p>	<p>Noted. The Council's 2018 Sustainable Drainage Systems (SuDS) and Flood Risk Information Note (https://www.sefton.gov.uk/media/3497/flood-risk-information-note-fulldoc.pdf) relates to Local Plan policy EQ8 'Flood risk and surface water' which remains relevant in the Bootle Area Action Plan area. The Information Note encourages developers to contact United Utilities at the earliest possible stage during the development process, and to use its free pre-development service. This is so that United Utilities can better understand the impact of development proposals on their network, including the approach to surface water drainage, points of connection, and the timing for the delivery of development. The Information Note goes on to give the relevant United Utilities contact details.</p>	None
United Utilities	General	<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 delivery of development with the timing for delivery of infrastructure. We recommend that you include a development management policy in your draft AAP to this effect. Our recommended policy is below. '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>Noted. The only areas that are expected to see significant change will be subject to detailed Masterplans. Other areas have extant planning permissions. We will engage with relevant infrastructure providers on the Masterplans. As such, it is not considered necessary to add the suggested policy to the AAP. Local Plan policy IN1 on Infrastructure and developer contributions remains in place.</p>	None
United Utilities	General	<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 at this early stage is in the best interest of achieving challenging delivery targets from allocated sites in the most sustainable and co-ordinated manner. We recommend that future policy requires applicants to provide drainage strategies for foul and surface water. For larger sites, we recommend that policy requires applicants to prepare an infrastructure phasing and delivery strategy. For strategic sites, 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 (policy wording provided).</p>	<p>Noted. The Council's 2018 Sustainable Drainage Systems (Suds) and Flood Risk Information Note (https://www.sefton.gov.uk/media/3497/flood-risk-information-note-fulldoc.pdf) relates to Local Plan policy EQ8 'Flood risk and surface water' which remains relevant in the Bootle Area Action Plan area. The Information Note encourages developers to contact United Utilities at the earliest possible stage during the development process, and to use its free pre-development service, to allow United Utilities to better understand the impact of development proposals on their network. Policy EQ8 also requires an integrated approach to the management of flood risk, surface water and foul drainage on development sites, and the Council considers that this applies to sites in multiple ownerships.</p>	None

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United Utilities	Section 3	UUW notes the proposed 'Vision' in the AAP. We recommend that this is expanded to reference to the need to respond to the climate emergency.	Noted. The Council declared a climate emergency in 2019 and this referenced in the objectives. It is proposed to amend the vision to reflect this.	Amend relevant part of the vision to: 'By 2040, a regenerated Bootle will be a place that provides a full range of opportunities to all its residents to live secure, fulfilling, healthy and supported lives whilst addressing key environmental challenges, including pollution and climate change.'
United Utilities	Section 3	Objective 13 of the AAP states: 'To set standards in new development that help the Council meet its climate change responsibilities.' We request that the council strengthens this objective as follows: 'Standards in new development must respond to the climate change emergency declared by the council in July 2019.'	Noted. However, the Council does not consider the suggested wording to be any improvement on its original wording.	None
United Utilities	General	The policies of the AAP should emphasise the importance of designing new development 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.	The Council recognises that climate change, green and blue infrastructure (including trees and landscaping) and surface water management should be referred to in policy BAAP1. Water efficiency is already covered in policy BAAP2. Location of development in relation to flood risk is covered by Local Plan policy EQ8 'Flood risk and surface water' and the National Planning Policy Framework.	A new section has been added to policy BAAP1 to say: <u>Development proposals should help mitigate and adapt to the impact of climate change by taking appropriate opportunities to protect and enhance green and blue infrastructure including soft landscaping and biodiversity and reduce surface water run-off rates and volumes and other sources of flood risk.</u>
United Utilities	General	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.	The Council recognises that climate change, green and blue infrastructure (including trees and landscaping) and surface water management should be referred to in policy BAAP1. Water efficiency is already covered in policy BAAP2. Location of development in relation to flood risk is covered by Local Plan policy EQ8 'Flood risk and surface water' and the National Planning Policy Framework.	A new section has been added to policy BAAP1 to say: <u>Development proposals should help mitigate and adapt to the impact of climate change by taking appropriate opportunities to protect and enhance green and blue infrastructure including soft landscaping and biodiversity and reduce surface water run-off rates and volumes and other sources of flood risk.</u>

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United Utilities	BAAP2 Best Use of Resources	<p>UUW is supportive of criterion 2 of Policy BAAP2 Best Use of Resources which relates to water efficiency in new development. 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.</p> <p>At the current time, Building Regulations includes a requirement for all new dwellings to achieve a water efficiency standard of 125 litres of water per person per day (l/p/d). In 2015 an 'optional' requirement was introduced which is currently set at 110 l/p/day for new residential development. This can be implemented through local planning policy where there is a clear need based on evidence. We have enclosed evidence to justify this approach. As you will see from the evidence, we believe that the optional standard can be achieved at minimal cost. We therefore recommend the criterion 2 is amended 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. 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 will ensure that the policy is reflective of any future change to the optional standard (which may be reduced below 110 l/h/d in the future. It also ensures that there is a water efficiency requirement for non-residential proposals.</p>	<p>United Utilities' support and relevant evidence in support of BAAP2's proposed water efficiency measures is noted and welcomed.</p>	None
United Utilities	General	<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.</p>	<p>The Council's 2018 Sustainable Drainage Systems (SuDS) and Flood Risk Information Note (https://www.sefton.gov.uk/media/3497/flood-risk-information-note-fulldoc.pdf) relates to Local Plan policy EQ8 'Flood risk and surface water' which remains relevant in the Bootle Area Action Plan area. Policy EQ8 refers to flood risk from all sources.</p>	None
United Utilities	General	<p>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. Table 1 within the Appendix to this letter sets out sites where an on-site modelled sewer flood risk has been identified. Whilst the strong preference of UUW is for development to take place outside of any identified flood risk in accordance with the sequential approach, we recognise the need to regenerate these sites and therefore we request that you include a site-specific policy for each site within Table 1. 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 policy (policy and explanatory wording provided). It is important that the above flood risks are referenced in your Strategic Flood Risk Assessment and fully understood as part of any development at the site. We recommend that any flood risk is better understood as soon as possible and prior to allocation so that the principle of development and the impact on any developable area can be confirmed.</p>	<p>Local Plan policy EQ8 'Flood risk and surface water' and the Council's 2018 Sustainable Drainage Systems (SuDS), Flood Risk Information Note (https://www.sefton.gov.uk/media/3497/flood-risk-information-note-fulldoc.pdf) and policy IN1 'Infrastructure and developer contributions' apply to the AAP area. The Council considers that this provides a robust policy framework and approach to managing and mitigating flood risk from all sources in the AAP area. The Council is aware that the whole of the Plan area is within Flood Zone 1 for river and tidal flooding, although parts of the Plan area are at risk of surface water flooding; and canal flood risk and other sources of flooding may be relevant also. As such the Council intends to prepare a proportionate update to the 2013 Strategic Flood Risk Assessment.</p>	None

Who responded	Policy Commenting on	Summary of comment	Council Response	Changes to AAP
United Utilities	General	<p>New development should manage foul and surface water in a sustainable way in accordance with national planning policy. We wish to emphasise the importance of any policy, including site-specific policy, 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.</p> <p>Paragraph 167 of the National Planning Policy Framework (NPPF) outlines that ‘When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment’.</p> <p>Noting that not all applications are required to submit a flood risk assessment, U UW wishes to outline that emerging policy should set an expectation that all applications will be required to submit clear evidence that the hierarchy for surface water management has been fully investigated to ensure that flood risk is not increased elsewhere. We wish to recommend that policy requires applicants to submit a foul and surface water drainage strategy that fully investigates the surface water hierarchy to minimise the risk of flooding and ensures that future development sites are drained in the most sustainable way whilst being resilient to the challenges of climate change. (suggested policy provided)</p>	<p>Local Plan policy EQ8 'Flood risk and surface water', policy IN1 'Infrastructure and developer contributions' and the Council's 2018 Sustainable Drainage Systems (SuDS) and Flood Risk Information Note (https://www.sefton.gov.uk/media/3497/flood-risk-information-note-fulldoc.pdf) apply to the AAP Plan area. Policy EQ8 stresses the need for sustainable drainage of surface water and set out the relevant sequential drainage/discharge hierarchy. As part of its Validation Checklist the Council requires developers of major housing development to complete Sefton's Drainage Pro Forma and encourages this for proposals of 5 - 10 homes. The Council considers that this provides a robust policy framework and approach to managing and mitigating flood risk from all sources in the Area Action Plan area.</p>	None
United Utilities	General	<p>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. We recommend the following wording. 'Applicants must identify land at the site 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>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>Local Plan policy EQ8 'Flood risk and surface water' and the Council's 2018 Sustainable Drainage Systems (SuDS) and Flood Risk Information Note (https://www.sefton.gov.uk/media/3497/flood-risk-information-note-fulldoc.pdf) apply to the Area Action Plan area. The policy stresses the need for sustainable drainage of surface water and set out the relevant sequential drainage/discharge hierarchy. As part of its Validation Checklist the Council requires developers of major housing development to complete Sefton's Drainage Pro Forma and encourages this for proposals of 5 - 10 homes. The Council considers that this provides a robust policy framework and approach to managing and mitigating flood risk from all sources and surface water drainage in the AAP area, and that additional policy is not required.</p>	None

Who responded	Policy Commenting on	Summary of comment	Council Response	Changes to AAP
United Utilities	BAAP1 Design	<p>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 131 within the NPPF. It is clear that public realm improvements represent an opportunity to improve surface water management. However, there is currently limited information in the AAP relating to sustainable drainage and how this could be integrated with on-site landscaping. Therefore, U UW wishes to recommend the following wording for inclusion within the AAP:</p> <p>‘Landscaping and public realm proposals, including proposals for tree-lined streets, must be integrated with the strategy for sustainable surface water management. Landscaping and public realm proposals must evaluate and identify opportunities for sustainable surface water management. This could be achieved through a variety of features including:</p> <ul style="list-style-type: none"> • permeable surfacing; • bio retention tree pits and bio retention landscaping; • rain gardens; • soakaways and filter drainage; • retrofitted swales; and • blue/green roofs.’ <p>We also support</p>	<p>Local Plan policy EQ8 'Flood risk and surface water' and the Council's 2018 Sustainable Drainage Systems (SuDS) and Flood Risk Information Note (https://www.sefton.gov.uk/media/3497/flood-risk-information-note-fulldoc.pdf) apply to the AAP area and refer to these issues. Policy BAAP1 now includes a requirement to take available opportunities to protect and enhance of green and blue infrastructure including landscaping (and trees), within the context of responding to the challenge of climate change. Policies such as BAAP4 Bootle Town Centre, BAAP11 Parks, Public Open Spaces and Playing Fields and BAAP24 Environmental Improvements refer to the public realm.</p>	None
United Utilities	BAAP1 Design	<p>Any approach to planting new trees must give due consideration to the impact on utility services noting the implications that can arise as a result 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>	<p>The Council considers that this is beyond the scope of development plan policy. However, the Council's 2018 Sustainable Drainage Systems (SuDS) and Flood Risk Information Note (https://www.sefton.gov.uk/media/3497/flood-risk-information-note-fulldoc.pdf) encourages developers to contact United Utilities at the earliest possible stage during the development process, and to use its free pre-development service, to allow United Utilities to better understand the impact of development proposals on their network. It is hoped that this process would allow United Utilities to protect its infrastructure from tree root ingress.</p>	None
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. 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>There are some significant assets that pass through the area. You / Applicants must not assume that these can be diverted or built over. Early engagement with United Utilities on these assets must occur so that the implications for development and construction can be understood.</p>	<p>Local Plan policy EQ8 'Flood risk and surface water' and the Council's 2018 Sustainable Drainage Systems (SuDS) and Flood Risk Information Note (https://www.sefton.gov.uk/media/3497/flood-risk-information-note-fulldoc.pdf) apply to the Area Action Plan area. The information Note encourages developers to contact United Utilities and the Canal and Rivers Trust at the earlier stage and provides contact details. It is considered that this policy framework and additional guidance is sufficient to deal with this issue.</p>	None
United Utilities	General	<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</p>	<p>Noted. These will be supplied to United Utilities as a statutory undertaker and 'Making Space for Water' partner.</p>	None

Who responded	Policy Commenting on	Summary of comment	Council Response	Changes to AAP
		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.		
United Utilities	General	<p>It is worth noting that the Environment Act 2021 places an obligation on sewerage undertakers in England to secure a progressive reduction in the adverse impacts of discharges from storm overflows to reduce the impacts on the environment and public health. This obligation has triggered the need for significant future investment in our wastewater assets (treatment and network). This investment will often be constrained by engineering circumstances to determine the most appropriate location for additional storage to reduce spills. This may necessitate investment away from existing treatment facilities such as in the green belt, the open countryside, and green areas in or adjacent to existing settlements.</p> <p>Consistent with meeting its obligations, U UW requests support for water and wastewater infrastructure investment that is ultimately beneficial to the environment, biodiversity, watercourses, and growth so that our investment can be delivered in the most timely and effective manner. The following policy wording is recommended:</p> <p>‘The Council will support water and wastewater infrastructure investment which facilitates the delivery of wider sustainable development and the meeting of environmental objectives of water and sewerage undertakers.’</p> <p>This policy would enable us to ensure we can continue to meet the growth and development aspirations of the region, by ensuring that fundamental infrastructure requirements are met and that we are able to respond to the need for investment in our assets to protect the environment and reduce flood risk.</p>	Local Plan policy IN1 'Infrastructure and developer contributions' and its explanation apply to the Area Action Plan area and deal adequately with this issue. There are specific references to wastewater infrastructure and to cooperation between the Council, United Utilities, and the Environment Agency.	None
United Utilities	General	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 interest may have restrictions that must be adhered to. It is the responsibility of the developer to obtain a copy of the associated legal document, available from United Utilities' Legal Services or Land Registry and to comply with the provisions stated within the document.	Noted. This is a procedural/process issue rather than a policy wording issue.	None
Resident	General	In general, if you want to upgrade Bootle the council need to keep the place tidy i.e. weeds and litter. Regular large item collections to try to stop people dumping furniture etc in alleys etc. It's a few that make the place a disgrace and a breeding ground for vermin. The parks and green spaces need better upkeep. All this might make the area more attractive to businesses. You wouldn't see a street market in Birkdale etc so why allow it outside the Strand. I'm fed up with the area I live in being labelled a deprived area. There are plenty of hardworking aspirational families in the area. Why always cater to the lowest common denominator?	The Plan's vision aspires to this. Policy BAAP1 Design places a lot of emphasis on measures to reduce littering, fly-tipping and anti-social behaviour, for example:"5. Proposals should not result in areas of land that have no clear responsibility for its maintenance. Land should be within the curtilage of a development, part of the public highway or within a park. This is to avoid areas becoming unkempt and attractive to littering and fly-tipping. 6. Careful consideration must be given to the collection and storage of waste and recycling in new developments to avoid littering and fly-tipping. This is particularly important for new businesses that sell prepared food and drink".	None

Who responded	Policy Commenting on	Summary of comment	Council Response	Changes to AAP
	BAAP21 Bootle Village Regeneration Opportunity Area	<p>Housing Sites - For the inclusion of the building on the corner of Well Lane/Waterworks Street - whatever is done with that building, parking will need to be seriously considered. Currently the parking along waterworks street is used by shoppers and workers for free parking for the Strand as there is no resident parking along there and it also gets congested at school start and finish times. People fly around the corner in cars from Litherland road and the parked cars on each corner means visibility is low when you come around the corner - it isn't ideal currently, so it needs thought about parking in the area before adding any more people to the area.</p> <p>Also, the old tannery building is severely run down and not being maintained by whoever is responsible, this year I have witnessed window glass being smashed by kids and the glass being left all over the pavement and parts of metal guttering pipes falling down onto Well Lane not to mention loose corrugated iron and wood boarding.</p> <p>I've noted comments in the document about litter and fly tipping being an issue in the Bootle area and Well Lane is certainly a hotspot for it which is aggravated by black sack collections and seagulls and rats getting into resident's rubbish - I agree the buildings need something doing with them but the whole street scene and litter disposal for residents also needs addressing for the area as a whole.</p> <p>The laburnum pub site - it would be a shame to demolish it - could it become a community pub or asset like the lock and quay rather than it being made into housing? Especially if more housing is being brought in at the gas works etc.</p>	Noted. If the site comes forward for redevelopment, the level of parking and how that is managed will have to be considered, particularly given its proximity to Bootle Strand and key offices. Clarification will be provided at part 4 of Policy BAAP21 to ensure that lower parking standards will have to be justified.	Change part 4 of Policy BAAP21 to: the Council will take a flexible approach (subject to justification) to the following: <ul style="list-style-type: none"> • private outdoor amenity space • car parking provision • interface distances
	General	You can always improve the are we all live but remember one thing. Freedom of choice and freedom of movement is always paramount.	Noted	None
Local Business	General	<p>We are a locally based scaffolding company having started our business here in Bootle almost 30 years ago. We do a lot of work for local housing associations, but we also supply domestic scaffolding to householders who want to carry out essential repairs to their homes or make improvements to them. Such work improves the way the local community looks. With the rise in the cost of building materials any planned improvements to one's home have become expensive.</p> <p>But what adds insult to injury is Sefton Council's rates for the cost of a scaffolding permit for the public highway. Currently this stands at £147 per week for a structure up to 10m in length. If a scaffold is up for say 6 weeks to cover the build, then this adds almost £900 to the cost. I would suggest that Sefton Council waive these licence fees for a period of say three years which will then encourage homeowners to improve the look of their homes without adding further costs to the job. It will also help firms such as us win some further domestic works.</p>	The scaffold permit process and costs of such permits are outside the scope and control of the development plan process and planning system. However, we have passed on this comment to the Highways Service.	None
	General	I believe Bootle needs to use its brownfield sites to good effect, and instead of building houses building good quality apartments to attract younger working populations. 4 or 5 storey long apartments with green spaces, areas to hold or lock bikes up and underground bin storage like the Liverpool region trials. Land on the corner of Linacre Lane and Hawthorne Road is an example of an area that is unused, has been for a decade and is a perfect spot for commutable apartments. Not high-rise blocks or space inefficient new build houses.	Noted. It is proposed to amend slightly part 3 of Policy BAAP1.	Amend part 3 of Policy BAAP1 as follows: Development proposals should make the most of and reflect Bootle's higher densities and good range of services and facilities within easy walking distance.

Who responded	Policy Commenting on	Summary of comment	Council Response	Changes to AAP
	General	<p>Probably the most important aspect of the entire BAAP as this encapsulates every aspect ranging from improving the area's investment potential, making the area greener through the use of carbon-rich storage organic building materials to better community relations between residents and different social groups. This would be a keyway to make the area more independent long-term and coveted by other independent wrapper-fund investors that would harness the area's heritage practically in the modern day similarly to Chester and Oxford which are built on these strong architectural merits. Traditional Vernacular architecture would give more employment opportunities and prevent the area being erased in pace of globalist contemporary architecture which is dated soon after new builds are constructed. In paying homage to Bootle's forefathers and original town planners this would strengthen grassroots ties amongst local residents and businesses that have been placed here for a long time with careful zoning allowing maximal use of the entire landscape in a way that benefits everyone. This will also support major infrastructure grants to central Government that will clean and enhance former industrial areas that would benefit from traditional style design housing which residents can be proud to call their home. Retaining all of Bootle's greenspaces, such as parks is commendable and should be adhered to by means of retaining the area's link with nature and respecting long-established ecosystems. Where conversions to flats and homes in multiple occupation conserve and keep Old Builds intact this shouldn't continue to be maligned so long as landlords are supported with genuinely outfitting their structures accordingly for tenants that may blend in seamlessly living their lives without disturbing others. Keeping highways clear and easy to use by motorists and visitors wishing to park freely for shops should be incorporated with the removal of all time-limited restrictions. Even the appearance of seeming busy can have a positive trickle effect on the local economy with more people frequenting and using the area for work and leisure alike. Car parking restrictions are an outdated concept that have been proven to stifle local economies and can severely impact on coastal towns that depend on tourism as a main source of income. Traditional Vernacular Architecture and its support is the best way of adopting Conservative, Labour and Liberal Democrat principles in the modern day granting everyone an opportunity to belong, flourish and deliver the greatest impact for their respective communities.</p>	<p>Noted. The Council considers that taken as a whole, the Bootle Area Action Plan emphasises the importance of Bootle's built and other heritage, and the local vernacular, seeks to retain and enhance this heritage and make the most of its role in supporting Bootle's regeneration. More specifically, policy BAAP1 'Design' promotes the use of local design codes.</p>	None
	BAAP4 Bootle Town Centre	<p>The strand shopping centre needs a completely overhaul. The old M&S unit needs an anchor tenant or to be repurposed into a produce food hall.</p> <p>The units facing onto Stanley Road need new appealing possibly double height shop fronts and public realm/outdoor seating massively improved.</p> <p>Focus should be less on charity shops and more effort into attracting decent retailers so that people actually want to visit.</p> <p>If the canal side venue is going to work, it needs more than a few containers and wooden planters. It needs resurfacing with high quality materials and access to the venue to be made more prominent. It also could do with some kind of leisure offer to bring people in as without it, I can only see locals using it.</p> <p>Some more effort needs to be made by the police in ensuring that undesirables aren't hanging around the public spaces as they're intimidating people and putting them off and worst of all giving people are really bad impression of Bootle.</p>	<p>Noted. The Council considers that policy BAAP4 provides the appropriate framework for the regeneration of Bootle Strand. The plans include for improved public realm and landscaping.</p> <p>Charity shops are retailers, and the planning system doesn't differentiate between types of retailers.</p> <p>Anti-social behaviour in public areas is a police matter.</p>	None

Who responded	Policy Commenting on	Summary of comment	Council Response	Changes to AAP
		<ul style="list-style-type: none"> • Taking opportunities for development to improve the health of local people <p>What does that mean? LtN and a form of ULEZ?</p> <ul style="list-style-type: none"> • Helping Bootle to deal with the climate emergency <p>What emergency? Why are you using hysterical language? And what's the deal?</p>	<p>There are lots of ways that planning can influence the health of residents, and these are set out in the draft Bootle AAP. There are no plans for a LtN or ULEZ in Sefton.</p> <p>The Council declared a climate emergency in July 2019 and the UK government in May 2019. The Bootle AAP reflects these.</p>	None
	Section 2	<p>Issue 9 - improve the local GP offering, there are nothing but complaints about local doctors, as we have higher amounts of long term illnesses, we should have increased GP offerings to match!</p> <p>Issue 13 - option 13D should be considered a priority to introduce as much greenery spread about the town as possible, not just concentrating on the parks. Review where micro green spaces could go, especially near the bigger roads (church rd. etc.) such as where Palmerston Avenue meets Croxteth Avenue could have a small green space with small trees/plants and a path for access to Lidl and the station.</p> <p>Issue 15 - option 15A would also be covered by this approach and should be considered in tandem.</p> <p>Issue 14 - developers should not be given any financial assistance to make their new homes greener, this will come from the buyers as the house value will be higher if the homes are more efficient which can still be dictated by planning permission policy. Instead, existing houses should be prioritised. A simple way to decipher which houses could get funding is to go by council tax band (A) and age of property as generally the older the property the worse the EPC rating, therefore 14H is the best option but funds should be solely for existing homes and new homes should just be controlled with policy. 14E could be considered but it should be paired with an offering of free or discounted travel for residents on Merseyrail and busses. In addition, 14C should be considered regardless as we will soon require the infrastructure for electric cars and terraced houses without driveways currently have no safe way of owning electric vehicles.</p> <p>Issue 16 - the council aren't here to mother the community and blocking fast food restaurants will only cause people to order from further afar moving the business away from Bootle, especially with the ease of Just Eat etc. 16B is a good to then encourage people to exercise and get fitter. If our obesity levels are too high, it is further proof that people aren't getting the help they need from their GPs.</p> <p>Issue 20 - 20E is a good point and Crime should certainly be taken into consideration.</p> <p>Finally, to increase the value of existing properties all council owned leaseholds should be given to the property owners as, even though the leasehold terms are reasonable, attempting to sell a house on leased land is impossible for the value the property is worth. Removing these leaseholds will cause a sudden increase of property value in the area bringing in a lot of wealth.</p>	<p>It is proposed to add a new section to policy BAAP10 Healthy Bootle to support in principle the provision of public health facilities, subject to other BAAP and Local Plan policies. This would include GP and dentist surgeries, and other relevant health facilities serving members of the public.</p>	<p>Add to Policy the following point: <u>Supporting in principle the provision of public health facilities (subject to other BAAP and Local Plan policies)</u></p>
	Section 2	<p>I believe that the "climate emergency" in Bootle is a ridiculous statement, the council wishes to cut carbon emissions, with the industry activities surrounding the docks, the high level of HGV and diesel rail freight I fear it is the motorists will be the target of this policy but sincerely hope it may mean retro fitted insulated homes so that stakeholders may benefit from such a policy, there happens to be a "climate emergency" in homes every winter, warmer homes would be welcomed by stakeholders rather than tax on the local motorists who access and contribute to the local community shop's, services etc</p>	<p>Local Plan policies EQ1 'Healthy Sefton' and EQ7 'Low carbon and energy efficient design' reflect the Council's wider commitment to securing energy efficiency and affordable warmth. Bootle Action Area Plan policy BAAP10 'Healthy Bootle' reflects this.</p>	None

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	BAAP4 Bootle Town Centre	<p>There is currently limited parking space at Strand House and only so many permits can be allocated. Of an evening after 6pm there is no parking whatsoever as car parks are shut and all streets are permit so people can't visit of an evening. How can residents move in or out of the block if they can't park a removal van outside and can't get a parking permit? In the regeneration plans can residents/visitors please have somewhere to park for residents and visitors of strand house. Somewhere accessible all hours of the day and somewhere they can stop for deliveries and removals. Currently it is a nightmare for everyone concerned.</p>	<p>A parking study for the Bootle AAP area is currently being undertaken and will inform future decisions on parking levels in the town. It will be difficult to provide additional parking for an existing residential block such as Strand House, particularly in the town centre. However, we have passed on this comment to the Highways and Regeneration Services.</p>	None
	BAAP2 Best Use of Resources	<p>Pleased to see emphasis on health, skills and plans for buildings and housing in the plans.</p> <p>One way that any new housing or buildings that are getting planning permission can also promote health through our environment is to make them both energy efficient (insulation, solar panels etc) and also ensure they have good ventilation/filtration systems to reduce spread of airborne infections (which do impact disproportionately on those who are disadvantaged already due to poverty, ethnicity, age, disability, other health problems etc).</p> <p>Ventilation and filtration systems could be incorporated into planning for any new buildings seeking planning permission.</p> <p>We should also look at how adequate ventilation/filtration systems can be installed in schools and health settings (the 'our child in the north' APPC report shows a significant reduction in sickness from installation of HEPA filters in classrooms for example).</p>	<p>Noted. Policy BAAP2 'Best use of resources' and BAAP10 'Healthy Bootle' focus on energy efficiency.</p>	None
	BAAP5 Bootle Office Quarter	<p>My biggest concern for Bootle is the decline of office workers and post COVID trend of working from home. The impact on the local economy and community is catastrophic. Local businesses and facilities that rely and feed off this sector is immense and far reaching. Added to fact that the council then facing loss of business rate revenue, the future is bleak especially for previous business hubs like Bootle. Our own council and central government are the worst offenders, encouraging home working.</p> <p>During lockdown, it was found that mental health, domestic violence, and poor lifestyles all increased, yet our councils continue this trend. Why? Services have declined and contacting any departments is protracted at best.</p>	<p>Comment noted; however, this is not something that can be addressed through the planning process.</p>	None

Next Stages

25. The amended draft Bootle Area Action Plan will be published in July 2024 and made widely available for comment. The documents will all be made available at www.sefton.gov.uk/BootleAAP and in hard copy at a number of Council locations in Bootle. It is expected that the period for comment will run to October 2024.

26. The Publication draft of the Bootle AAP, and comments received to it during the period for comment, will be submitted to the Secretary of State for Examination in Public. Examination in Public commences on submission. Public hearings may be required. If so, these will likely take place in Bootle Town Hall during early 2025 and will be well notified beforehand.

27. The Bootle Area Action is found 'sound', it is expected to be adopted by the Council sometime during 2025.