

Statement of Consultation Delivery and Allocations Local Plan

(incorporating Partial Review of the Core Strategy)

July 2019

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your vision
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Halton Local Plan

Delivery and Allocations Local Plan

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Statement of Consultation

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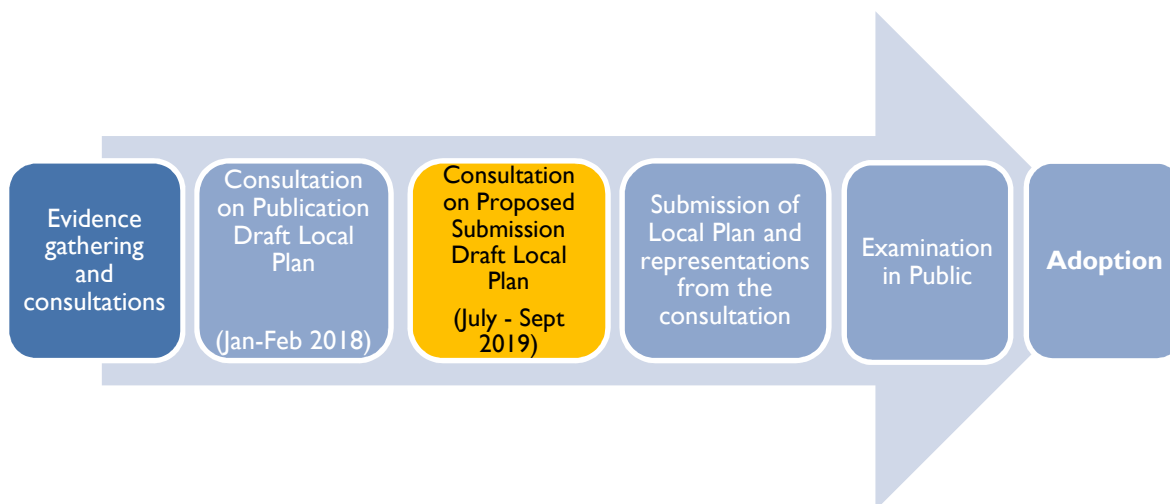
1. Introduction

- 1.1 This Report sets out the details of publicity and consultation undertaken to date during the preparation of the Halton Local Plan Delivery and Allocations Proposed Submission Document (incorporating partial review of Core Strategy) ('draft DALP'). It sets out how the Council has complied with the relevant Government regulations¹, and its adopted Statement of Community Involvement (SCI), together with details of how the Council has responded to the points raised during each formal consultation stage.

Stages of Producing a Local Plan

- 1.2 When preparing a new Plan, Councils must carry out certain formal consultation stages to ensure that the public and other stakeholders have the opportunity to contribute to and influence the Plan.

Figure 1: Stages in preparing a plan



- 1.3 To date the Council has carried out the following stages of formal consultation;
- Consultation on the Scope of the DALP (2014)
 - Consultation of the Revised Scope of the DALP (2016)
 - Consultation of the Draft Publication DALP (2018)
- 1.4 Following the adoption of the Halton Core Strategy in 2013, it was the original intention that the Delivery and Allocations Local Plan (DALP) would simply update and replace the

¹ Town and Country Planning (Local Planning) (England) Regulations 2012

remaining saved policies from the Halton Unitary Development Plan (adopted 2005). This formed the basis of the original Scoping consultation undertaken in 2014.

- 1.5 Following on from the original Scoping consultation, it became evident that, due to the changing requirements of the Government's National Planning Policy Framework (NPPF) and Planning Policy Guidance (PPG), it was unlikely that the DALP Plan as originally envisaged would conform to the revised Government policy.
- 1.6 This was largely due to the Core Strategy commitment to undertake a Green Belt Review, which needs to be informed by a robust assessment of the 'demand' for housing (known as the 'Objectively Assessed Need') and other uses. Production of the Core Strategy pre-dated NPPF and PPG and as such, the adopted Core Strategy housing and employment policy figures were not prepared in compliance with the latest methodologies set out in these documents and would not stand up to scrutiny at Examination.
- 1.7 The housing figure in particular raised concerns. Housing figures need to have regard to economic aspirations and as such, both need to be looked at together. Given this, the Council considered it needed to 'widen the scope' of the DALP, and consulted on this Revised Scope in 2016.
- 1.8 The Council will consult on the draft Halton Local Plan (DALP) between 4th January and 15th February 2018. This formed the - "Publication" - of consultation as shown on Figure 1. This document contained both revised Core Strategy policies and Delivery and Allocations policies. It intends to replace policies in the Core Strategy covering topics such as the housing, employment and retail, allowing the requirements to be updated with the appropriate up to date evidence. Whilst also still replacing the remaining policies of the UDP and providing site allocations, appropriate designations and policies to guide development management.
- 1.9 The Council are now proposing to consult on the Proposed Submission Version of the DALP between 25th July 2019 and 19th September 2019.
- 1.10 Further details of each of the consultations undertaken can be found in the following sections of this document:
 - Section 2: Consultation on the Scope of the DALP (2014)
 - Section 3: Consultation on the Revised Scope of the DALP (2016)
 - Section 4: Consultation on the draft DALP Publication document (Jan 2018)
 - Section 5: Consultation on the Proposed Submission DALP document (July 2019)

2. Delivery and Allocations Scoping Document 2014

Original (2012) Consultation on the Scope of the Delivery and Allocations Local Plan (Reg 18 Consultation)

- 2.1 This first stage of the Delivery and Allocations Local Plan Scoping Document was to set out the 'scope', essentially meaning that it identified the policies that are needed within the plan in order to guide the future development of the Borough.
- 2.2 The Local Plan consultation on the Delivery and Allocations Local Plan Scoping Document took place between 10th February 2014 and 25th March 2014. It represents preparatory work under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 2.3 The consultation was carried out in accordance with the requirements included within Halton Borough Council's Statement of Community Involvement 2013.

Consultation Documents

- 2.4 The consultation documents comprised the Delivery and Allocations Local Plan Scoping Document, a Sustainability Appraisal Scoping Report and the Infrastructure Plan Review 2014.
- 2.5 Comments forms were produced, that could be completed for any of the consultation documents and were provided as stand-alone documents and as part of an online consultation form.
- 2.6 All of the consultation documents and the consultation forms were accessible via Halton Borough Council's website and can still be viewed at www.halton.gov.uk/DALP
- 2.7 Copies of the consultation documents were made available for inspection at the Halton Direct Links (HDLs) at Halton Lea, Runcorn; Brook Street, Widnes; and Granville Street, Runcorn or at the Libraries at Runcorn Shopping Centre (formerly known as Halton Lea), Runcorn; Granville Street, Runcorn; Kingsway, Widnes and Ditton, Widnes.
- 2.8 The consultation forms were also made available to take away at the above venues and could be returned to the Planning Policy Team, at Halton Borough Council's offices in Widnes.
- 2.9 E-mails and letters, along with copies of the documents and comments forms, were sent out to all Council Members and all of the Parish and Town Councils, within the Borough, to inform them that the consultation was taking place. They were also informed that copies of the documents were available at the locations listed in 2.7 paragraph above.

- 2.10 Copies of the documents and a covering letter were sent out to Natural England, English Heritage, the Environment Agency and Natural Resources Wales.
- 2.11 On 4th February 2014, a letter was sent to all consultees, who had registered on Halton Borough Council's Planning and Transport Consultation Database, advising that the consultation on the Delivery and Allocations Local Plan Scoping Document and associated documents would take place between 10th February and 25th March 2014. This was sent to a total of 1,089 addresses.
- 2.12 The consultees included local residents, landowners and developers, along with the 'specific consultation bodies'; 'general consultation bodies' and 'residents and other persons carrying out a business in the Local Planning Authority's area', as required by Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Web Site

- 2.13 The consultation document could be accessed via the Local Plan pages, www.halton.gov.uk/localplan and a specific page of the Delivery and Allocations Local Plan at www.halton.gov.uk/DALP.
- 2.14 The website includes links to an online consultation form, enabling stakeholders to respond to the consultation electronically and to register their details, so that they can be informed of future Local Plan stages. The comments forms could also be submitted by e-mail or post.
- 2.15 In total, between 10th February and 25th March 2014, the Local Plan web page and the Delivery and Allocations Local Plan web page, on the Halton Borough Council web site, received 3,462 unique visits and a total of 6,133 page views.

Publicity and Media Coverage

- 2.16 The consultation has included a press notice on 5th February 2014 published in the Runcorn and Widnes World, announcing that the consultation on the Delivery and Allocations Local Plan and associated documents would take place between 10th February 2014 and 25th March 2014.

Meetings and Briefings

- 2.17 The Planning Policy Team offered to meet with the Town and Parish Councils of Halton to discuss the Delivery and Allocations Local Plan Scoping Document, however, only Halebank took up the offer and the Council attended their Parish Council meeting on the 18th February 2014.

Consultation Responses

2.18 The detailed consultation responses are provided in Appendix A. A summary of the key points and issues raised in the consultation responses is provided below.

Key Issues to be resolved	Council Response
Section 1: Purpose of the Scoping Document	
No key issues raised.	No action required.
Section 2: Policy Framework	
Include reference to the National Planning Practice Guidance (PPG).	Appropriate references to the PPG will be included within subsequent drafts of the emerging Plan.
Section 3: Supporting Documents	
No key issues raised.	No action required.
Section 4: Evidence Base	
Include reference to the historic environment	The DALP will be supported by an appropriate and proportionate evidence base, including concerning evidence in relation to heritage assets and Green Infrastructure.
Include reference to the Liverpool City Region Green Infrastructure Framework.	
Ensure that the evidence base is up to date.	The Council has recently completed new evidence such as the GTTAA and are currently updating evidence documents such as the Retail Study and will continue to review documents as it is considered necessary.
Section 5: Timetable	
No key issues raised.	No action required.
Section 6: Vision & Objectives	
There should be an objective seeking the provision of significant numbers of higher value, lower density family homes, in order to rebalance the housing offer of the Borough.	The Council considers that this is already covered by the objectives, which already looks to create balanced communities.
There should be an objective that recognises the role and value of sport and recreation in contributing to health and well-being and to the economy.	The provision for Sport and active leisure / travel crosses a number of themes and is reflected across a number of Strategic Objectives, namely 6, 7, 9, 10 and particularly 11. The Council considers this is adequate and mirrors the cross cutting nature / benefits of active leisure/travel.
Section 7: Residential Development Policies	
The Council should not introduce Local Standards for housing as this is considered a matter for Building Regulations.	The Council will take this into consideration when drafting policies and will not seek to introduce additional unnecessary Local Standards.

Key Issues to be resolved	Council Response
Include reference to the HCA as a key landowner within the Borough.	The Council will make reference to the importance of key landowners such as the HCA where relevant.
Need to consider the impact on residential amenity, particularly when considering the smaller parcels of land, where impact on the character and amenity of the existing area can be significant.	The Plan will set out appropriate policies for detailed management of development.
Should make reference to the need to review the Green Belt.	The Council will continue to make reference to the need for Green Belt release as appropriate. There will be a temporary policy contained within the Plan to help to identify the allocations that are to be removed from the Green Belt.
Section 7: Economic Development Policies	
Include reference to the LEP as a key partnership in taking forward the sub-regional economic strategy.	Information in relation to the Local Enterprise Partnership will be included in the next stage of the Delivery and Allocations Local Plan.
Concern raised regarding the 3MG site.	Consideration will be given to all existing allocations, to ensure that these remain the most appropriate sites for development.
Define complementary services and facilities.	The Council will include further information to the justification to define the uses that will be considered as complementary.
Section 7: Town, District and Local Centres Policies	
Include reference to 'Cultural Facilities'.	Reference to 'Cultural Facilities' has been included within Policy HC5.
Define the term 'Community Facilities'.	'Community Facilities' are now defined in the introductory text for Policy HC6 and within the glossary.
Need to ensure that the retail policies are flexible enough to ensure that retail needs can be met in the event that any allocated sites do not come forward.	The Council will seek to create a suitably flexible policy that meets the requirements of the NPPF.
Key role played by parking in centres.	The Delivery and Allocations Local Plan Policy C2 will contain a policy on parking standards that will ensure that all development is appropriately served
The requirement for additional floorspace should be based on an up-to-date evidence base. The policy wording must also be flexible enough to ensure that retail needs can be met in the event that allocated site(s) do not come forward..	The Council are undertaking a Retail Study which will provide an appropriate evidence base to support policy. The Council will seek to create a suitably flexible policy that meets the requirements of the NPPF.
Section 7: Key Areas of Change Policies	

Key Issues to be resolved	Council Response
Give consideration to the potential to include any areas removed from the Green Belt as new Key Areas of Change.	The Council will consider if it is appropriate to create any additional Key Areas of Change, as part of the production of the Plan, taking into consideration the size and location of development.
Policy KA4: East Runcorn should be as flexible as possible and reserve the detail until the masterplanning process is completed.	The Council intend to provide details of proposed development, phasing, infrastructure implications and principles of development, they will look to work with the appropriate stakeholders in preparing this.
It is considered that developments around the canal should make appropriate contributions to its ongoing enhancement and maintenance.	It is agreed that developments in the vicinity of the Canal should make the most of potential interfaces with the Canal, in terms of leisure, recreation, sustainable transportation and amenity terms and as such policy HE3 has been included to address this issue.. The Council will continue to require S106 as appropriate during the planning application process.
Section 7: Green Belt Policies	
Need to make reference to the North Widnes and Hale Green Belt Review.	The supporting text for the Green Belt policies and the Site Allocations, as appropriate will include reference to the Draft Widnes and Hale Green Belt Study in addition to the Halton Green Belt Study 2017.
Green Belt policies should reflect the requirements of the NPPF.	The Council believes that the policies it has prepared reflect the requirements of the NPPF.
Include a specific policy for Hale Village.	Land within Hale Village will be designated and allocated in the same way the land is allocated across the Borough.
Section 7: Connectivity Policies	
Need to include a specific telecommunications policy.	Policy C3 Delivery of Telecommunications Infrastructure deals specifically with telecommunications.
There should be a policy within the Local Plan specifically addressing the issue of level crossings.	It is likely that the level crossings in Halton will be considered as part of the Key Areas of Change, allocations and in policy preparation.
Section 7: Sustainable Design Policies	

Key Issues to be resolved	Council Response
How will the council ensure new development does not lead to yet more of a traffic burden for the borough?	The Local Plan cannot prevent people from choosing to own and use a private car, and all development will almost inevitably lead to a degree of additional traffic. The Halton Core Strategy Local Plan encourages journeys to be made by sustainable modes of travel and sets out that the Council and its partners will support a reduction in the need to travel. This will be achieved through various measures including directing development to sustainable locations, ensuring development is well connected, requiring the production of Travel Plans and Travel Assessments and setting maximum parking standards. These themes are dealt with in more detail through the Delivery and Allocations Local Plan Connectivity Policies.
Applicants should be required by policy to thoroughly investigate the surface water hierarchy on sites identified for development	Policy HE4: Green Infrastructure includes measures for surface water run off in addition policy HE9 includes measures required to address flooding in relation to the surface water hierarchy. Flooding has also been given consideration with each proposed site allocation.
The open space standards are not appropriate for pitch sports. The Council's Playing Pitch Strategy (PPS) provides a site specific action plan which should be used to inform pitch sport provision associated with housing development.	NPPF requires the Council to plan positively for social, recreational and cultural facilities. Whilst there is no specific mention of local standards, policies will need to be based on a proportionate assessment of need and will need to provide certainty to both developers and the local community.
There are no policies relating to indoor sports provision either to protect existing or provide new/enhanced. New provision may be required as a result of an increase in demand arising from new housing development.	Provision of additional housing in itself does not guarantee an increase in the Borough's population and certainly not in the age ranges most likely to take part in active sports. The Council will consider the latest demographic forecasts to the end of the plan period to assess the need for various supporting infrastructure, including formal sports provision.
Section 7: Natural and Historic Environment Policies	
Include reference to the setting of heritage assets.	Consideration of the setting of heritage assets has been addressed in policy HE2: Heritage assets and the historic environment.
Include reference to undesignated heritage assets.	Consideration of undesignated heritage assets is included within policy HE2: Heritage assets and the historic environment..

Key Issues to be resolved	Council Response
Ensure that reference is made to the networks of habitats for flora and fauna.	Policy HE1: Natural environment and nature conservation seeks to protect and improve the Ecological Network including the Liverpool City Region Nature Improvement Area, In addition policy HE4 Green Infrastructure Network makes provision for networks for flora and fauna.
The designations should also include the existing and proposed Green Networks.	The Green Networks is part of the Green Infrastructure Network designation, and have will be identified as part of the list of designations.
Include a reference to the broader protection of landscapes.	Policy HE5: Trees and Landscaping and policy HE13: Open Countryside considers landscapes.
Recognise the value of sport and recreation in health and well-being and economic and social terms.	The Council recognises the value of sport and recreation in health and well-being and will make greater reference to this within the Plan.
Policy should include a commitment to minimising impacts on biodiversity and geodiversity.	The Council will include this commitment within the appropriate policy.
Policy should include a reference to the broader protection of landscapes.	Policy HE5: Trees and Landscaping and policy HE13: Open Countryside policy has been included within the DALP to provide protection to the landscape.
Section 7: Pollution and Risk Policies	
Need to include the surface water hierarchy within policies and establish the most specific drainage principles.	Further information will be provided in Policy HE9: Water Management and Flood Risk in relation to the surface water hierarchy, and this will also be given consideration in site allocation
Consideration of the risks of CoMah sites.	The Council will take COMAH sites into consideration when preparing policies, allocating sites and designating sites in accordance with Core Strategy policy CS23:Manageing Pollution and Risk
Section 7: Minerals Policies	
Policies need to demonstrate a sustainable approach to minerals including reducing the need to exploit primary resources and promoting the use of re-cycled and secondary mineral resources.	It should be noted that Policy CS25 of the adopted Core Strategy states that 'To minimise the need for minerals extraction, the use of recycles and secondary aggregates across the Borough will be encouraged'. This policy is retained and this intention is further included in DALP Policy HE10 and HE11.
Should consider the extraction of conventional and unconventional hydrocarbons.	The the extraction of conventional and unconventional hydrocarbons is addressed in Policy HE11:Minerals and Subterranean Resource Extraction.
Section 8: Site Allocations, Designations and Policies Map	

Key Issues to be resolved	Council Response
Need to make reference to the North Widnes and Hale Green Belt Review.	The supporting text for the Green Belt policies and the Site Allocations, as appropriate will include reference to the Halton's Green Belt Study.
Ensure that appropriate consideration is given to the historic environment, proximity to the waterway network, residential amenity, the railway network, COMAH zones and pipelines, when considering sites for allocation.	The Council will consider all the issues raised in this consultation as part of the Site Assessments and prior to allocating sites. The Council will continue to work with stakeholders and statutory bodies to make sure that appropriate sites are selected and appropriate mitigation measures are put in place where required.
Need to give consideration to the historic environment when identifying allocations.	The Council will take heritage assets and their settings into consideration when allocating sites including consideration of potential to reveal the significance of the asset or to tackle heritage at risk. Site Allocations will include reference to historic environment attributes where appropriate.

3. Delivery and Allocations Scoping Document 2016

- 3.1 The Council previously consulted on the scope of the proposed Delivery and Allocations Local Plan in February 2014 as detailed above, at that time it was intended that the DALP be limited to replacing the remaining 'saved' policies in the Halton Unitary Development Plan of 2005.
- 3.2 The housing numbers within the Halton Local Plan Core Strategy (the Core Strategy) were derived from the Regional Strategy for the North West (2003~2021). The National Planning Policy Framework (NPPF) makes it clear that the Local Plan should be based on an up to date, objectively assessed need (OAN) for housing across the local Housing Market Area.
- 3.3 Experience from planning appeals and local plan examinations in other parts of the country show that plans based on the old regional spatial strategies, or districts where there isn't enough land earmarked in plans to keep a positive five year supply, are often unable to protect their communities from housing proposals put forward by developers on sites which aren't allocated in a local plan and don't comply with plan policies. This means they haven't been compared against other possible sites and local people haven't had the opportunity to have a say, or worse, were considered and rejected for housing through a plan preparation process, so may not be the best sites in the best locations for new homes. The Council must make sure it retains the primacy of its development plan by moving forward with the Delivery and Allocations Local Plan.
- 3.4 The Government has signed a Devolution Agreement with Halton, the five Merseyside Authorities and the Liverpool City Region Local Enterprise Partnership that will see the devolution of additional powers to the new office of Mayor. These powers include defined strategic planning functions, including the production of a Single Statutory Strategic Framework for the City Region.
- 3.5 There are overlaps between the Spatial Policies of the Halton Core Strategy Local Plan, including policies proposed in the revised scope of the Delivery and Allocations Local Plan and the proposed City Region Strategic Framework. The Devolution Agreement requires that the development of the Strategic Framework must not delay the preparation of Local Plans and as such, Halton proposes to proceed with the Delivery and Allocations Local Plan as set out in this scoping document whilst fully engaging with partner authorities to support and influence the delivery of the Spatial Framework.
- 3.6 Given the changes detailed above, it was considered necessary to extend the scope of the DALP to also revisit selected policies from the Core Strategy. This change is considered material and required a further consultation on the revised scope.

Revised format of the Delivery and Allocations Local Plan

- 3.7 Once adopted, the Delivery and Allocations Local Plan and Core Strategy Local Plan will provide a robust and up-to-date policy framework to guide future development within the Borough.
- 3.8 Specifically, the Delivery and Allocations Local Plan and associated Adopted Policies Map will:
- a. Replace the remaining saved policies of the Halton UDP (adopted April 2005).
 - b. Refresh and update, selected policies of the Core Strategy (adopted April 2013).
 - c. Include allocations of land for residential, employment, retail, leisure and other land uses.
 - d. Identify areas to be designated and protected for landscape, nature conservation, environmental and heritage reasons.
 - e. Provide policies to guide decision making in the development management process.
 - f. Replace the existing UDP Proposals Map

Public Consultation

- 3.9 The public consultation for the revised scope of the Delivery and Allocations Local Plan took place from Thursday 28th January to Thursday 10th March. Only comments received during the consultation period have been considered.
- 3.10 The consultation was carried out in accordance with the requirements included within Halton Borough Council's Statement of Community Involvement 2013.

Consultation Documents

- 3.11 The consultation documents comprised the Delivery and Allocations Revised Local Plan Scoping Document, a Sustainability Appraisal Scoping Report, Equality Impact Assessment and Call for Sites .
- 3.12 Comments forms were produced, that could be completed for any of the consultation documents and were provided as stand-alone documents and as part of an online consultation form.
- 3.13 All of the consultation documents and the consultation forms were accessible via Halton Borough Council's website and can still be viewed at www.halton.gov.uk/DALP

- 3.14 Copies of the consultation documents were made available for inspection at the Halton Direct Links (HDLs) at Halton Lea, Runcorn; Brook Street, Widnes; and Granville Street, Runcorn or at the Libraries at Runcorn Shopping Centre (formerly known as Halton Lea), Runcorn; Granville Street, Runcorn; Kingsway, Widnes and Ditton, Widnes.
- 3.15 The consultation forms were also made available to take away at the above venues and could be returned to the Planning Policy Team, at Halton Borough Council's offices in Widnes.
- 3.16 E-mails and letters, along with copies of the documents and comments forms, were sent out to all Council Members and all of the Parish and Town Councils, within the Borough, to inform them that the consultation was taking place. They were also informed that copies of the documents were available at the locations listed in the paragraph above.
- 3.17 Copies of the documents and a covering letter were sent out to Natural England, Historic England, the Environment Agency and Natural Resources Wales.
- 3.18 On 27th January 2016, a letter was sent to all consultees, who had registered on Halton Borough Council's Planning and Transport Consultation Database, advising that the consultation on the Delivery and Allocations Local Plan Scoping Document and associated documents would take place between 28th January and 10th March 2016. This was sent to a total of 395 addresses.
- 3.19 The consultees included local residents, landowners and developers, along with the 'specific consultation bodies'; 'general consultation bodies' and 'residents and other persons carrying out a business in the Local Planning Authority's area', as required by Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Web Site

- 3.20 The consultation document could be accessed via the Local Plan pages, www.halton.gov.uk/localplan and a specific page of the Delivery and Allocations Local Plan at www.halton.gov.uk/DALP
- 3.21 The website includes links to an online consultation form, enabling stakeholders to respond to the consultation electronically and to register their details, so that they can be informed of future Local Plan stages. The comments forms could also be submitted by e-mail or post.
- 3.22 In total, between Thursday 28th January and Thursday 10th March, the Local Plan Updates web page and the Delivery and Allocations Local Plan web page, on the Halton Borough Council web site, received a total of 1,174 page views.

Publicity and Media Coverage

- 3.23 The consultation has included a press notice on 27th January 2016 published in the Runcorn and Widnes World, announcing that the consultation on the Delivery and Allocations Local Plan and associated documents would take place between 28th February and 10th March 2016.

Meetings and Briefings

- 3.24 The Planning Policy Team offered to meet with the Town and Parish Councils of Halton to discuss the Delivery and Allocations Local Plan Scoping Document, however, none of the Parish Council decided to hold a meeting at this stage.

Consultation Responses

- 3.25 The detailed consultation responses to the revised Delivery and Allocations Local Plan scoping document are provided in Appendix B. A summary of the key points and issues raised in the consultation responses is provided below.

Key Issues to be resolved	How this issue has been addressed at Publication
Section 2: Policy Framework	
Consideration needs to be given to the Housing and Planning Act, together with anticipated changes to the NPPF.	Section 2 now includes reference to the Housing and Planning Act. The implications of this Act and changes to the NPPF have been taken into consideration in preparing this document and as and when more information is available this will also be taken into consideration as the Plan progresses.
Take account of the Government's strategy for the Northern Powerhouse.	Although no specific reference is made to these documents within Section 2 of the document, they have all been taken into consideration in the preparation of the Plan. Most notably in preparing policy CS(R)1: Halton's Spatial Strategy.
Take account of the Liverpool Economic Partnership's Strategic Economic Strategy and Growth Strategy.	
Take account of the Liverpool City Region Strategic Housing and Employment Land Market Assessment (SHELMA).	
DALP should be progressed as expeditiously as possible, but take joint evidence and information into account to allow for consistency with the Liverpool Spatial Framework.	It has been considered appropriate to continue to progress with the Halton Local Plan at this time in advance of the Single Statutory Strategic Framework for the City Region. The jointly produced evidence will continue to be taken into consideration as appropriate.
Section 3: Supporting Documents	
No key issues raised.	No action required.

Key Issues to be resolved	How this issue has been addressed at Publication
Section 4: Evidence Base	
Include reference to the historic environment	Reference has been made to Listed Buildings in Halton Compendium and to the emerging Local List.
Ensure that the evidence base is up to date.	The Council has recently completed new evidence such as the GTTAA, Retail Study, Mid Mersey SHMA and the SHELMA and will continue to review documents as it is considered necessary. Work is currently underway to prepare a Playing Pitch Strategy and Open Space Audit.
Clarify when the Green Belt Study will be complete.	The Council consider the Green Belt Study as an iterative document that may continue to evolve as sites are considered in the Halton Local Plan and as and when more information becomes available. The document will continue to be produced and made available alongside the production of the Local Plan.
Section 5: Vision & Objectives	
Strategic Objectives of the DALP should include boosting the supply of 'aspirational' and family homes and to ensure the housing needs of both the Widnes and Runcorn areas are fully met.	Due to the limited nature of changes requested the Council are not intending to amend the Vision or Strategic Objectives of the adopted Local Plan Core Strategy. However, in accordance with NPPF the local plan will support strong, vibrant and healthy communities, by planning for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community.
The Local Plan should cover more than the period to 2028.	The Council agrees with Peel and are extending the plan period for the Local Plan to 2037.
Section 6: Supporting Halton's Economy	
Provision of up to date economic forecasts that support the economic growth potential of the authority.	The Council have worked, and will continue to work with the LEP and other City Region Authorities in relation to detailed economic forecasting. This evidence has been fed into the LCR SHELMA, and used to produce both the housing and employment figures. These figures are set out in the Revised Core Strategy Policies and Delivery and Allocations and have been used as part of the evidence to support the housing and employment requirements set out in policy CS(R)1: Halton's Spatial Strategy. The Council considers that an appropriate level of homes and employment opportunities to meet the OAN and create a sustainable balance for the Borough are set out in this policy.
Include reference to the LEP as a key partnership in taking forward the sub-regional economic strategy.	
There is a need to provide an appropriate supply of employment land; balance the supply of new homes with the creation of job opportunities; and provide homes to attract and retain skilled workers.	

Key Issues to be resolved	How this issue has been addressed at Publication
Define complementary services and facilities.	The Council will include further information to the justification for Policy E3 to define the uses that will be considered as complementary.
Need to take into consideration issues with viability of delivering employment.	The Council have given further consideration to the issue of viability and have sought to include reference to viability within appropriate policies e.g. within the Justification for Policy CS(R)1: Halton's Spatial Strategy. It should be noted that a whole plan viability assessment will be undertaken as part of the production of the Local Plan.
Section 7: Housing	
Include reference to the HCA as a key landowner within the Borough.	The Council will make reference to the importance of key landowners such as the HCA within the introduction to the Residential Policies Section.
Ensure that an appropriate housing requirement is provided based on appropriate calculation of the OAN, along with an appropriate split across any sub-areas.	The Council will provide for an appropriate level of homes and employment opportunities to meet the OAN and create a sustainable balance for the Borough.
Include reference to the need for larger family homes.	It is considered appropriate to include a policy on ensuring an appropriate housing mix, based on current evidence within the Local Plan.
Retain a flexible approach to the density of residential development.	The Council will take this into consideration whilst drafting the policy on density.
Provide an appropriate policy covering the provision of 'Starter Homes'.	It is considered appropriate to include a policy which addresses Starter Homes. This has been addressed in the revision to policy CS(R)13: Affordable Housing. Further text may be added to the DALP in relation to Starter Homes as and when there is sufficient detail available from Government.
Consideration needs to be given to the viability of development and how this will be taken into account in housing delivery.	The Council agrees that viability of development is an important matter which should be addressed as part of the plan making process.
The Local Plan will need to ensure that it tackles the issues of affordability, home ownership and attracting a skilled workforce.	Evidence base documents, such as the Mid-Mersey SHMA and LCR SHELMA consider these issues. These documents have been taken into consideration in preparing the Revised Core Strategy Policies and Delivery and Allocations Local Plan document.
The Local Plan will need to address the issue of an ageing population.	
Section 8: Connectivity	

Key Issues to be resolved	How this issue has been addressed at Publication
Need to include a specific telecommunications policy.	The Scoping Document included a specific policy on Telecommunications and the DALP+ document will continue to do so as set out in policy C3: Delivery of telecommunications infrastructure..
Delivering the infrastructure needed to sustain growth is a key challenge for all development plans.	The Infrastructure Plan will be reviewed alongside the production of the Local Plan.
Infrastructure such as the Eastern Access Transport Corridor (EATC) could deliver significant benefits.	The operation and expansion of LJLA in line with its 2007 Master Plan will in principle be supported, including proposals for a runway extension and the new Eastern Access Transport Corridor (EATC).
Opportunities for freight transport via the Manchester Ship Canal should be maximised and new links to these networks should be encouraged.	The Council will take this into consideration when drafting policies.
Need to consider not only the land requirements of the Airport (and safeguarding its operation) but also the impacts upon environmental assets of new development associated, both directly and indirectly, with the Airport.	It has been considered appropriate to retain Policy CS17 of the Core Strategy; this policy includes measures to ensure appropriate mitigation. It is also noted that the proposed new policies will all be informed by a Sustainability Assessment and Strategic Environmental Assessment, this will help to ensure that appropriate mitigation measures are incorporated into the policies.
Section 9: Town, District and Local Centres	
Need to ensure that the retail policies are flexible enough to ensure that retail needs can be met in the event that any allocated sites do not come forward.	The Council will seek to create a suitably flexible policy that meets the requirements of the NPPF.
The DALP should include a Policy which supports the continued operation and expansion of existing retail uses within the Borough.	This will be taken into consideration when drafting the appropriate policies.
'Community facilities' should be defined.	This will be taken into consideration when drafting the appropriate policies.
Policy should consistently refer to 'leisure and cultural facilities'.	This will be taken into consideration when drafting the appropriate policies.
Section 10: Halton's Environment	
The protection of both urban and rural 'greenspaces' (e.g. parks and village greens) for their own social, amenity and environmental value should be considered.	This will be taken into consideration when drafting the appropriate policies.

Key Issues to be resolved	How this issue has been addressed at Publication
Need to include the surface water hierarchy within policies and establish the most specific drainage principles.	Further information will be provided in the Flood Risk policy in relation to the surface water hierarchy, and this will also be given consideration with the site allocations.
Need to consider the Water Framework Directive and the North West River Basin Management Plan.	These documents will be taken into consideration when drafting the appropriate policies.
Consider identifying consultation zone for major hazard establishments and major accident hazard pipelines.	This will be taken into consideration when drafting the appropriate policies.
Include an analysis of compatible development within the consultation zones of major hazard establishments and MAHPs.	This will be taken into consideration when drafting the appropriate policies.
The proposed policy should also set out a policy framework which allows for the extraction of conventional and unconventional hydrocarbons, including coal bed methane and other technologies such as underground coal gasification.	The Local Plan is expected to provide the policy context for mineral extraction including those for the extraction of conventional and unconventional hydrocarbons.
Section 11: Sustainable Development in Halton	
Include reference to the setting of heritage assets.	Consideration of the setting of heritage asset is included within Policy NH1.
Need to make reference to the North Widnes and Hale Green Belt Review.	The supporting text for the Green Belt policies and the Site Allocations, as appropriate will include reference to the Widnes and Hale Green Belt Study.
Green Belt policies should reflect the requirements of the NPPF.	The Council believes that the policies it has prepared reflect the requirements of the NPPF.
Include a specific policy for Hale Village, including giving consideration to the vitality of the village.	The Council have taken the future viability of Hale into consideration when drafting policies that will affect this area.
Green Belt is not an environmental designation. It is a planning policy. Reference to Green Belt should be removed from this chapter.	The Green Belt policies have been given their own section of the document to avoid any issue of clarity.
The scope of the policies in this section is not appropriate it includes environmental issues which should have been included elsewhere and does not include sufficient reference to the other elements of sustainability.	The format of the document has now been amended to reflect concerns raised in relation to the location of policies.
Following the Government's Housing Standards Review the energy requirements for new dwellings was identified as a matter solely for the Building Regulations.	This will be taken into consideration when drafting the appropriate policies.
Section 12: Key Areas of Change Policies	

Key Issues to be resolved	How this issue has been addressed at Publication
Give consideration to the potential to include any areas removed from the Green Belt as new Key Areas of Change.	This will be taken into consideration when drafting the Local Plan.
Any amendments to the Key Area of Change policies should be fully informed and based upon a robust evidence base.	The Council will seek to work closely with key stakeholders to ensure that appropriate policy is prepared for the area.
Give consideration to the necessary infrastructure to make the Key Areas of Change successful.	
Section 13: Site Allocations	
Need to make reference to the North Widnes and Hale Green Belt Review.	The supporting text for the Green Belt policies and the Site Allocations, as appropriate will include reference to the Widnes and Hale Green Belt Study.
Ensure that appropriate consideration is given to the historic environment, proximity to the waterway network, residential amenity, the railway network, COMAH zones and pipelines, existing sources of pollution, when considering sites for allocation.	The Council will consider all the issues raised in this consultation as part of the Site Assessments and prior to allocating sites. The Council will continue to work with stakeholders and statutory bodies to make sure that appropriate sites are selected and appropriate mitigation measures are put in place where required.
Consider whether the current Green Belt boundary follows the appropriate built form boundary.	The Green Belt boundary will be considered as part of the ongoing Widnes and Hale Green Belt Study.
Sites submitted for consideration include: • Former Court House, Widnes • Former Police Station, Widnes • Eastern edge of Hale Village • Pavilions, Sandy Lane, Runcorn • Land between Hale and the proposed EATC • Northern side of Hale (accessed from Carr Lane) • Mersey Edge, Speke • Land at East Runcorn adjacent to Preston Brook Marina • Land bounded by Town Lane and Church End, Hale Village • Land off Cronton Lane, Widnes • Rivendell Garden Centre, Widnes • Barrows Green, Widnes • Hale Gate Road, Widnes • Mill Green Farm, Widnes • Former Riverside College, Runcorn	Where considered appropriate as part of the Green Belt Study or for non-Green Belt sites, sites that have been submitted for development have been considered through the Site Assessment process. The Proposed Policies Map will set out the potential allocations and designations for the Borough.

Key Issues to be resolved	How this issue has been addressed at Publication
• Chapel Lane, Widnes • Land off Chester Road, Runcorn • Land to the east of A56, Runcorn • Land to the east of Chester Road, Runcorn • Land to the south of Daresbury Lane, Runcorn • Land to the west of Chester Road, Runcorn • North of Daresbury Lane, Runcorn • Land to east of Norlands Lane, Widnes • Land to west of Norlands Lane, Widnes • Abbey Farm, South Lane, Widnes • Widnes Golf Club, Highfield Road, Widnes • Wilmere Park, Widnes • Former BPI Stretchfilms, Warrington Road, Widnes • Pond House, Ramsbrook Lane, Hale, Widnes • Cranshaw Farm, Widnes	

4. Delivery and Allocations Publication Document 2018

- 4.1 This document allowed for consultation on the Delivery and Allocations Local Plan (DALP) and the revised policies of the Core Strategy.
- 4.2 The DALP sets out the planning policies and land allocations to guide decisions on the location, scale and type of development and changes in the way land and buildings are used. The Revised Core Strategy will update the appropriate Core Strategy policies in line with the current evidence base. The other Core Strategy policies will be retained and are not subject to consultation.

Public Consultation

- 4.3 The public consultation on the draft DALP Publication Document took place from **4th January to 15th February 2018**
- 4.4 The consultation was carried out in accordance with the requirements included within Halton Borough Council's Statement of Community Involvement.

Consultation Documents

- 4.5 The consultation documents comprised the draft DALP Publication document, a Sustainability Appraisal, Equality Impact Assessment, Habitats Regulations Assessment, a 'Call for Sites', and the supporting evidence base.
- 4.6 Comments forms were produced, that could be completed for any of the consultation documents and were provided as stand-alone documents and as part of an online consultation form.
- 4.7 All of the consultation documents and the consultation forms were accessible via Halton Borough Council's website and can still be viewed at www.halton.gov.uk/DALP
- 4.8 Copies of the consultation documents were made available for inspection at the Halton Direct Links (HDLs) at Halton Lea, Runcorn; Brook Street, Widnes; and Granville Street, Runcorn or at the Libraries at Runcorn Shopping Centre (formerly known as Halton Lea), Runcorn; Granville Street, Runcorn; Kingsway, Widnes and Ditton, Widnes.
- 4.9 The consultation forms were also made available to take away at the above venues and could be returned to the Planning Policy Team, at Halton Borough Council's offices in Widnes.
- 4.10 E-mails and letters, along with copies of the documents and comments forms, were sent out to all Council Members and all of the Parish and Town Councils, within the Borough, to

inform them that the consultation was taking place. They were also informed that copies of the documents were available at the locations listed in the paragraph above.

- 4.11 Letters were sent out to all statutory bodies to notify them of the consultation.
- 4.12 A letter/email was sent to all consultees, who had registered on Halton Borough Council's Planning and Transport Consultation Database, advising that the consultation on the Delivery and Allocations Local Plan Draft Publication Document and supporting evidence documents would take place between 4th January and 15th February 2018.
- 4.13 The consultees included local residents, landowners and developers, along with the 'specific consultation bodies'; 'general consultation bodies' and 'residents businesses in the Local Planning Authority's area', as required by Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Website

- 4.14 The consultation document could be accessed via the Local Plan pages, www.halton.gov.uk/localplan and a specific page of the Delivery and Allocations Local Plan at www.halton.gov.uk/DALP
- 4.15 The website includes links to an online consultation form and a printable form to fill in and return to the Council, enabling and Consultees and the public to respond to the consultation electronically and to register their details, so that they can be informed of future Local Plan stages. The comments forms could also be submitted by e-mail or post.

Publicity and Media Coverage

- 4.16 The consultation included a press notice on published in the Runcorn and Widnes World, announcing that the consultation on the Delivery and Allocations Local Plan and associated documents would take place between 4th January 2018 and 15th February 2018.

Meetings and Briefings

- 4.17 The Planning Policy Team offered to meet with the Town and Parish Councils of Halton to discuss the Delivery and Allocations Local Plan Draft Publication Document. The Council met with Halebank Parish Council and Moore Parish Council during the consultation period.

Consultation Responses

- 4.18 The detailed consultation responses to the Delivery and Allocations Local Plan Draft Publication document are provided in Appendix C. A summary of the key points and issues raised in the consultation responses is provided below.

Key Issues to be resolved	Council Response
Housing Figures Throughout the representations received there has been a significant mix of support for both a lower and higher housing figure, the latter primarily being from landowners/developers who suggest that the highest growth scenario from the SHELMA is the most suitable. The lower figure was supported by residents from the Halebank area; where 80ha of land is proposed for a total of 1,773 dwellings. The justification for the distribution of housing figures within the Borough has also been criticised through not following the Inspectors recommendations from the Core Strategy where each settlement was to be assigned a proportion of the housing allocation.	Since the publication of the Draft DALP in 2018 the government released the standard housing methodology. This mechanism uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic undersupply. In response to elected members, and following the previous DALP (2018) consultation, a new scenario is proposed based on 350 dwellings per year giving a total of 8,050 dwellings over the 20 year plan period. This is above the minimum standard required by government however, it has led to a number of sites being removed from the previous draft which are either Green Belt sites or open space sites within the urban area. This new housing figure is above the Governments draft Standard Methodology (285 pa) and above the SHELMA baseline Scenario of 326pa. It is also above the demographic baseline in Widnes /Hale, and therefore the strategy will push economic derived excess towards Runcorn where anticipated net jobs growth is to be concentrated.
Viability Study The lack of a Viability study during the draft DALP (2018) consultation raised a number of issues from stakeholders, landowners and developers. A Viability study will provide the sound evidence base for a number of polices within the DALP, as per proposed changes in the NPPF whereby the viability emphasis is now firmly placed on the plan preparation stage and not on subsequent site by site assessments as previously was the case; including affordable housing and specialist housing. The absence of this information led to a number of concerns over the figures that Halton are requesting on development sites. This has further implications on other polices including density requirements as some sites may prove to be unviable.	Following on from these comments and as part of the wider evidence base for the DALP, the Council instructed HDH Planning Ltd to undertake a Whole Local Plan Viability Study. The Viability Study assesses the viability impacts of the emerging planning policies, specifically advises on affordable housing, in terms of percentage that can and should be sought from qualifying sites and review the capacity for the introduction of the Community Infrastructure Levy (CIL).
Affordable Housing	

Key Issues to be resolved	Council Response
The main issues regarding affordable housing link to the lack of a Viability Study, one this evidence base has been undertaken the suggested percentages will be justified. There is also confusion over the wording of the policy and how the provision for affordable homes works; for example of the 25% requires on 10 more dwellings will the 10% percentage in perpetuity that is required be part of the 25% / 20% or in addition.	The Whole Plan Local Viability study looked into the viability of delivering affordable housing on developments in Halton. From the study it was established that 20% affordable housing was viable on the allocated residential sites, 25% on Greenfield sites and 0% on brownfield sites. From this % of affordable housing. Affordable housing will be required to be delivered in perpetuity, of which not less than 10%² of the total affordable housing supplied being for affordable home ownership.
Site Allocations	
A number of representation were received regarding specific site allocations. Concerns were raised over the loss of green space, highways issues, residential amenity and lack of infrastructure.	The following sites have been removed from the DALP in the Proposed Submission Version. • M1 - Land to the rear of Beechmoor and Hollybank, Moore • M2 - Land south of Manor Farm, Runcorn Road, Moore • M3 – Land between rail line and canal to north of A558, Moore • M4 – Land between Canal and Rail line at Moore, Moore • M5 – Land between rail lines, Moss Lane and Moore Lane, Moore • M6 – Land between Moss Lane and Moore Lane, Moore • M7 - Moss Lane Nursery, Moore

² As part of the overall affordable housing contribution from the site.

Key Issues to be resolved	Council Response
	• R3 – Land adjacent to Trinity Methodist Church • R4 - Land to the west of Stockham Lane • R9 - Former Polar Ford Second Hand Cars Site • R13 - Land off Hankey Street • R16 – Land adj. to Runcorn Station Car Park • R18 - Land between Runcorn Spur Road and the Bridgewater • R21 - Land to the rear of the Red Admira • R57 – Land at The Heath Business and Technical Park • R58 - The Heath, Heath Road South (Site D) • R79 - Land between Stalbridge Dr and WCML
	• H2 – Home Farm, Hale • H3 - Land at Ramsbrook Lane, Hale • W6 - Pex Hill • W7 - Open Space to rear of Pesto • W13 - Land at Hale Gate Road • W16 - Land north of the Eight Towers Public House • W18 – Naylor Road • W19 – The Bongs • W22 - Arley Drive • W25 – Upton Rocks - Lanark Gardens Site • W26 - Land south of Bechers Local Centre • W33 - Arley Drive Open Space, Grizedale Street • W36 - Lynton Crescent • W41 - Notcutts Garden Centre • W46 - Land at Hall Avenue / Ditchfield Road • W48 - Land to south of Hale Bank Road

Key Issues to be resolved	Council Response
	• Included alternatives in the DALP Proposed Submission are: • R84 - Land between The Office Village, Daresbury Park and Bridgewater Canal • W49 – Lunts Heath Road (East) • W50 - (former Stobarts site) Foundry Lane
Paying Pitch Strategy	
Whilst a number of representations highlight that an up to date evidence base is missing from the Draft DALP (Playing Pitch Strategy), it is also evident that this could cause a delay to the Submission version of the DALP due to the study being seasonal.	Work is underway to appoint consultants to undertake the study.
Education	
Representations were received from residents in the Borough regarding the lack of school places for both primary and secondary age children.	Following consultation with the Education department at Halton Council, there are currently a sufficient number of school places within Halton to accommodate the needs of the Borough. The DALP allocates land for school sites in Halebank, Sandymoor and a proposed SEN school allocation within Widnes, should evidence dictate that additional school provision is required over the plan period.
Non Breeding Bird Survey	
It is noted that the Draft DALP HRA lacks information on bird feeding areas, whilst there is some work that has been undertaken on this from the Mersey Gateway Project this will need confirmation that it is suitable and sufficient, as initial suggestions are that the study only covers the upper Mersey estuary or boundary of the Mersey Gateway Trust mitigation and not the SPA element of the Estuary.	Following representations to the Draft DALP (2018) Halton Council instructed AVIAN to undertake a Non Breeding Bird Survey. The scope of the study was agreed by Natural England and MEAS.
SA Alternatives	

Key Issues to be resolved	Council Response
NPPG Paragraph: 002 Reference ID: 11-002-2014030 requires that reasonable alternatives are assessed as part of the Sustainability Appraisal process. This issue has been raised a number of times by various representations and is a justified point. This will need to be addressed in the submission version of the DALP.	Some alternatives at the scoping stage were assessed however, the majority of respondents have felt we have not explained why we have chosen sites in preference to others and therefore on a site level have not stated why the alternative sites were not selected. This is a valid point as this was not addressed in the publication report. Halton Council has now published the Sustainability Appraisal to accompany the Proposed Submission version of the DALP. This contains the assessment of the proposal policies and alternative and the proposed allocations and alternatives.
COMAH	
HSE made a lengthy representation highlighting how their methodology affects each of the sites proposed in the Draft DALP, the two conflicting methodologies need to be addressed with further clarification as the HSE suggest that most of the Borough is not suitable for development.	The Council has assessed the proposed site allocations in relation to the COMAH zones and a number of sites have been removed. The Council is not currently reviewing policy CS23 of the Core Strategy as part of the DALP. Therefore no changes to CS23 will be made.
Soils	
Throughout the DALP there doesn't appear to be any reference to soils, this issue was raised by Natural England and also addresses the best and most versatile land. Due to the nature of the Borough and high levels of past and present industrial use the loss of any prime agricultural land could be an issue, therefore best and most versatile need to be retained.	<u>Policy CS6 of the Proposed Submission DALP now contains the following wording:</u> <i><u>"Additionally, the irreversible development of open agricultural land will not be permitted where it would result in the loss of the best and most versatile agricultural land, except where absolutely necessary to deliver development allocated within the Local Plan, strategic infrastructure or development associated with the agricultural use of land."</u></i>

- 4.19 In total there were around 948 responses from customers making over 4,750 comments and two petitions.
- 4.20 From the representations received a number of Key Issues have been identified most of which surrounded the lack of evidence which was planned to commence over the months following the Draft Publication Consultation 2018, or questioned the evidence used to support the policy approach.

5. Delivery and Allocations Proposed Submission Document 2019

Public Consultation

- 5.1 The public consultation on the DALP Proposed Submission Document will take place from **25th July 2019 to 19th September 2019.**
- 5.2 The consultation will be carried out in accordance with the requirements included within Halton Borough Council's Statement of Community Involvement.

Public Consultation

- 5.3 The consultation documents comprised the Proposed Submission DALP document, a Sustainability Appraisal, Equality Impact Assessment, Habitats Regulations Assessment and the supporting evidence base.
- 5.4 Comments forms have been produced, that can be completed for any of the consultation documents and are provided as stand-alone documents and as part of an online consultation form.
- 5.5 All of the consultation documents and the consultation forms are accessible via Halton Borough Council's website and can be viewed at www.halton.gov.uk/DALP
- 5.6 Copies of the consultation documents are available for inspection at the Halton Direct Links (HDLs) and Libraries.
- 5.7 The consultation forms are also available to take away at the above venues and can be returned to the Planning Policy Team, at Halton Borough Council's offices on Kingsway, Widnes.
- 5.8 E-mails and letters, along with copies of the documents and comments forms, will be sent out to all Elected Members and all of the Parish and Town Councils, within the Borough, to inform them that the consultation is taking place. They are also informed that copies of the documents were available at the locations listed in the paragraph above.
- 5.9 Letters/email will be sent out to Natural England, Historic England, the Environment Agency and Natural Resources Wales and all other statutory bodies/consultees.
- 5.10 During July 2019, a letter/email will be sent to all consultees, who had registered on Halton Borough Council's LDF Consultation Database, advising that the consultation on the Proposed Submission DALP Document and associated documents would take place between **25th July and 19th September 2019.**

- 5.20 The consultees include local residents, landowners and developers, along with the 'specific consultation bodies'; 'general consultation bodies' and 'residents and other persons carrying out a business in the Local Planning Authority's area', as required by Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012

Web Site

- 5.21 The consultation document can be accessed via the Local Plan pages, www.halton.gov.uk/localplan and a specific page of the Delivery and Allocations Local Plan at www.halton.gov.uk/DALP
- 5.22 The website includes links to an online consultation form, enabling stakeholders to respond to the consultation electronically and to register their details, so that they can be informed of future Local Plan stages. The comments forms could also be submitted by e-mail or post.

Publicity and Media Coverage

- 5.23 The consultation has included a press notice on published in the local news paper, announcing that the consultation on the Delivery and Allocations Local Plan and associated documents would take place.

Appendix A: Scope of the Delivery and Allocations Local Plan (2014)

Consultation Comments

Consultee	Consultee Comment (Summarised)	Council Response
Ms Rose Freeman The Theatres Trust 00629/4/001 QUEST19 Town, District and Local Centres Policies	Appendix A lists the NPPF requirements for a range of suitable sites for town centres and includes the word 'cultural'. Unfortunately this word does not appear on pages 20 and 21 and we suggest for consistency and clarity that Policy 12/TC3 Commercial Leisure Facilities should include 'cultural' in all bullet points to read leisure and cultural facilities	Agree that 'cultural' has not been referred to specifically within the Policy Outline. This omission will be rectified in subsequent drafts of the emerging Plan.
Ms Rose Freeman The Theatres Trust 00629/4/002 QUEST19 Town, District and Local Centres Policies	A small point, but there is no definition for the term 'community facilities' (nor in the Core Strategy), and so that guidelines are clear and consistent we suggest the following - community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.	Agree that a definition of 'community facilities' would be beneficial to be included within the Delivery and Allocations Local Plan. A Glossary including a definition for Community Facilities will be included in subsequent drafts of the emerging Plan.
Ms Rose Freeman The Theatres Trust 00629/4/003 QUEST19 Town, District and Local Centres Policies	It is unfortunate that performance spaces (theatres) do not easily fit under any exact planning guidance heading - they can be a main town centre use, an element in a town's evening economy, a heritage asset, a tourist attraction, a business unit, a leisure facility, a cultural component or a community facility. They have been included within all these headings in various local authority planning policy documents, but there is now clear guidance in the NPPF and the NPPG for the support of communities' health, social and cultural well-being. The NPPF recommends that established cultural facilities and services are retained and are able to develop for the benefit of the community, and there should be policies to guard against the unnecessary loss of valued cultural and community facilities.	Noted. The DALP will seek to afford the appropriate protection to established cultural facilities for the benefit of the community.
Mr Alan Hubbard National Trust 00634/6/001 QUEST2	Generally agreed, but now needs to include specific reference to DCLG's recently issued Planning Practice Guidance.	Agreed. Appropriate references to the NPPG will be included within subsequent drafts of the emerging Plan.

Consultee	Consultee Comment (Summarised)	Council Response
Mr Alan Hubbard National Trust 00634/6/002 QUEST4	Whilst the evidence base includes appropriate documents in respect of landscape and ecological resources, there is no reference to any heritage resource documents - for example any overarching historic environment strategy, Conservation Area Appraisals or a Sites and Monuments record.	Comment noted. The DALP will be supported by appropriate / proportionate evidence base, including concerning heritage assets.
Mr Alan Hubbard National Trust 00634/6/003 QUEST29	Policies 28/29 - the policy approach to airport, and related, development needs to also ensure that in itself it is 'sustainable development' and adequately address social and environmental considerations, not solely economic ones.	Comment noted. Core Strategy policy CS17, which is the overarching policy for the airport, covers this point, requiring that future development and expansion demonstrates that it is in accordance with Halton's Sustainable Development Principles and that negative environmental and social impacts are appropriately addressed.
Mr Alan Hubbard National Trust 00634/6/004 QUEST33 & 34	Policy 33 - there is no overt reference here to the 'setting' of heritage assets despite its clear significance both in terms of Listed Buildings legislation and more generally for all heritage assets in the NPPF. Often heritage assets can be safe hands and well looked after and it is inappropriate development within their wider setting that is the main threat to their significance.	Comment accepted. Reference to the 'setting' of heritage assets is lacking within the Policy Outline of Policy 33. This omission will be rectified within the draft policy.
Mr Alan Hubbard National Trust 00634/6/005 QUEST33 & 34	Policy 34 - one of the biggest issues around nature conservation, and in particular how flora and fauna can adapt to climate change impacts, relates to the network of habitats and how they are linked. So the policy approach should specifically address the matter of maintaining and enhancing overall nature conservation habitat networks and especially the wildlife corridors that connect key habitats.	Agree that the policy should address the matter of maintaining and enhancing overall nature conservation habitat networks.
Mr Alan Hubbard National Trust 00634/6/006 QUEST39 & 40	Policies 44 and 45 - these Policies should demonstrate a sustainable approach to minerals issues, including reducing the need to exploit primary resources and promoting the use of re-cycled and secondary mineral resources.	Agree with statement. Policy CS25 of the adopted Core Strategy states that 'To minimise the need for minerals extraction, the use of recycles and secondary aggregates across the Borough will be encouraged'.
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/001 QUEST 1	JLL notes Halton Borough Council's intention to prepare the DAALP to support the Council's adopted Core Strategy and spatial vision. The purpose of the Scoping Document is to identify the policies that are needed within the DAALP. JLL welcome the opportunity to comment and input at this early stage. However, we consider that the deadline for comments should not be absolute and kept under	Comments noted. Halton Borough Council recognises the iterative process for the preparation of the Delivery and Allocations Local Plan and although set consultation periods will be undertaken, the Council welcomes ongoing discussions with members of public, stakeholders, landowners and developers. However, it is also important that comments made are published and considered at certain stages

Consultee	Consultee Comment (Summarised)	Council Response
	review. JLL has no further comments to make at this stage.	during the Plans preparation so we would encourage comments within certain dates so that these can be considered and reported as necessary.
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/002 QUEST 2	JLL notes the proposed DAALP preparation process and consider that this should be kept under review. At a national level there is a need to have regard to the National Planning Policy Framework ('NPPF') and the National Planning Practice Guidance. In particular, regard should be had to paragraph 47 of the NPPF which seeks to boost significantly the supply of housing land and to identify key sites which are critical to the delivery of the housing strategy over the plan period. Regard should also be had to Paragraph 83 of the NPPF, which states, inter alia, that once established, Green Belt boundaries should only be altered, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. At a local level there is a need to have regard to the emerging North Widnes and Hale Green Belt Study.	Comment noted. NPPF Para 47 makes reference to meeting, in full, the Objectively Assessed Need (OAN) for Housing. Following this Scoping consultation and having regard to emerging 'best practice' the Council has concluded that it cannot proceed without specifically addressing the issue of OAN. This may entail widening the 'scope' of the DALP and necessitate consultation on a 'Revised Scope'. The Council are currently undertaking a Green Belt Review and this will feed into Site Assessments and into the consideration of sites within the Delivery and Allocations Local Plan.
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/003 QUEST 3	There is a need to have regard to the emerging North Widnes and Hale Green Belt Study prepared in accordance with Core Strategy Policy CS6 and ensure that the methodology followed within the study is robust and accords with the NPPF.	As set out in the Evidence Base section of the Scoping Document the Delivery and Allocations Local Plan will be supported by a range of evidence base documents, some completed and some emerging. This includes the Widnes and Hale Green Belt Study.
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/004 QUEST 4	JLL supports the evidence base outlined in Section 4 including the Widnes and Hale Green Belt Study and the latest Strategic Housing Land Availability Assessment. The Policies should have regard to the Mid Mersey Strategic Housing Market Assessment which was prepared in 2011 and consideration should be given to updating this. Whilst it is acknowledged that the Halton Landscape Character Assessment is a material consideration, the DAALP should recognise that the North Widnes and Hale Green Belt Study will reconsider the landscape character of the Borough and therefore the weight to be	Comment in relation to SHMA noted. The Council will seek to work with Mid-Mersey partners to commission a revised SHMA to produce a NPPF compliant figure for Objectively Assessed Need. This may entail widening the 'scope' of the DALP and necessitate consultation on a 'Revised Scope'. As set out in the Evidence Base section the Council along with the other Councils in the Sub-Region are giving consideration to the production of a Sub-Regional (Liverpool City Region) SHMA. The Halton Landscape Character Assessment will remain a

Consultee	Consultee Comment (Summarised)	Council Response
	attached to this is limited. The objectives should fully acknowledge and recognise the purposes of the Green Belt as set out in NPPF and established within the North Widnes and Hale Green Belt Study Methodology, these include:- - To check the unrestricted sprawl of large built up areas - To prevent neighbouring towns from merging into one another - To assist in safeguarding the countryside from encroachment - To preserve the setting and special character of historic towns Some of the existing evidence base documents may need to be updated as the DAALP progresses, given the length of time which has passed.	consideration that will inform rather than be replaced by the Green Belt Study. The DALP will acknowledge the purposes of the Green Belt. The evidence will be kept under review.
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/005 QUEST 5	We are concerned that the timetable has already slipped. The Inspector reporting on the Core Strategy anticipated that the DAALP would be adopted in 2014. The current timetable should be examined to consider whether the adoption date of September 2015 can be brought forward. There should be no delays in the timetable as these will affect the ability to achieve and deliver the vision, objectives and spatial strategy set out in the Core Strategy.	This comment is noted. The timetable will be kept under review to ensure that it reflects as accurately as possible the production of the document. The Council agrees that unnecessary delays should be avoided, however, the Council do need to ensure that it is prepared soundly and effectively not just speedily.
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/006 QUEST 6	The challenges set out in the Core Strategy are still relevant today in particular the need to have separate targets for Widnes and Hale, and the recognition that satisfying the targets will result in releasing land from the Green Belt; such an approach will ensure that the DAALP is effective and sound and identify a flexible and responsive supply of housing land.	The Core Strategy included the distribution of the housing figure north and south of the river. It is not anticipated that the DALP will move away from this position, unless the evidence base suggests the need to do so.
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/007 QUEST 7	The DALP should recognise that in order to satisfy the housing requirements for Widnes and Hale, there is a need to release land from the Green Belt.	The Core Strategy recognises there is a need for a partial review of the Green Belt and this acknowledgement continues into the DALP.
Mr Mike Hopkins	The Core Strategy recognises that there is a need to identify the	The need to review the Green Belt is not felt to be appropriate to

Consultee	Consultee Comment (Summarised)	Council Response
Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/008 QUEST 8 and 9	broad areas of search within which the Green Belt review should be carried out and to identify the scale of any such release. The Vision should recognise the need for the review. This should include the need to set out the phasing of the release.	include within the Vision for the Delivery and Allocations Local Plan. It is felt that the need to provide housing is appropriately covered in the first sentence which states 'In 2028, Halton is well equipped to meet its own needs with housing for all sections of society'.
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/009 QUEST 10	Yes the objectives are still relevant, however should recognise that there will need to be a release of land from the Green Belt.	The need to review the Green Belt is a policy response to, rather than an Objective in itself for the Delivery and Allocations Local Plan.
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/010 QUEST 11	It is considered that the recognition of a Green Belt Review would ensure the provision of a flexible and responsive supply of housing land over the plan period. Other objectives that should be included in the DAALP are: To ensure that the Green Belt Review satisfies the objectives of the NPPF; and to maintain the identity of neighbourhoods and villages.	The need (or otherwise) to review the Green Belt is a policy response rather than an Objective in itself. It is also felt that Objective 8 sufficiently covers the need for development to positively contribute to its locality and as such would maintain the identity of neighbourhoods and villages.
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/011 QUEST 12	In principle the housing policies and principles are supported, however there should be recognition that Policies CS1, CS3 and CS6 of the Core Strategy refer to the need to review the Green Belt in North Widnes and Hale.	Where sites are proposed to be allocated and removed from the Green Belt, subsequent to the completion of the Green Belt Review, this will be highlighted in the justification to the policy.
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/012 QUEST 13	We note the housing policies and principles that are listed, but we reserve the right to comment when detailed policy wording is proposed by Halton Borough Council.	Noted.
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/013	Not at this stage. We reserve the right to comment when detailed policy wording is proposed by Halton Borough Council.	Noted.

Consultee	Consultee Comment (Summarised)	Council Response
QUEST 14		
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/014 QUEST 15	We note the economic development policies and principles listed, but we reserve the right to comment when detailed policy wording is proposed by Halton Borough Council. We consider that the Policies should provide specific support for existing businesses, including those in the Green Belt.	Noted.
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/015 QUEST 16 and 17	Not at this stage. We reserve the right to comment when detailed policy wording is proposed by Halton Borough Council.	Noted.
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/016 QUEST 18	We note the Town, District and Local Centres Policies and Principles. We reserve the right to comment when detailed policy wording is proposed by Halton Borough Council.	Noted.
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/017 QUEST 19 and 20	Not at this stage. We reserve the right to comment when detailed policy wording is proposed by Halton Borough Council.	Noted.
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/018 QUEST 21 and 22	No Comment on the areas identified. This policy should however recognise North Widnes and Hale as a Key Area of Change on the basis that Policy CS1 identifies the area within Table I: Distribution of Identified Development Potential.	Core Strategy Table I contained reference to Widnes/Hale (ALL) rather than referencing a (potential) Key Area of Change. Depending on the outcome of the Green Belt Study and any resulting proposed green belt releases / allocations, it may be appropriate to consider creating additional KAOc.
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited)	The policies should acknowledge Core Strategy Policy CS6, which states that a partial Green Belt review will be necessary during the	The introduction to the Green Belt policies already includes a reference to Policy CS6, the need for a partial review and its limited

Consultee	Consultee Comment (Summarised)	Council Response
behalf of Notcutts Limited) 00707/4/019 QUEST 24	early part of the plan period to ensure a sufficient ongoing supply of deliverable development land to meet the requirements of the Borough's separate communities, as set out in CS1, CS3 and CS4. It should recognise that this review will be limited to meeting the identified needs of North Widnes / Hale, taking account of foreseeable development requirements beyond the Plan period. The Policy should also recognise and acknowledge the purposes of the Green Belt as set out in NPPF and established within the Green Belt Review these include:- To check the unrestricted sprawl of large built up areas To prevent neighbouring towns from merging into one another To assist in safeguarding the countryside from encroachment To preserve the setting and special character of historic towns We reserve the right to comment when detailed policy wording is proposed by Halton Borough Council.	nature. It is intended to retain this reference. The DALP will make reference to the purposes of the Green Belt.
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/020 QUEST 25	Policy 20 should fully recognise the advice within paragraph 89 of the NPPF in respect of the development of new buildings which are not inappropriate development, including limited infilling or partial or complete redevelopment. We reserve the right to comment when the detailed policy wording is proposed by Halton Borough Council.	Policy GB2 (Policy 20) will make reference to development that is not considered inappropriate in the Green Belt.
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/021 QUEST 26	Not at this stage. We reserve the right to comment when detailed policy wording is proposed by Halton Borough Council.	Noted.
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/022	No comment at this stage. We reserve the right to comment when detailed policy wording is proposed by Halton Borough Council.	Noted.

Consultee	Consultee Comment (Summarised)	Council Response
QUEST 27		
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/023 QUEST 28 and 29	Not at this stage. We reserve the right to comment when detailed policy wording is proposed by Halton Borough Council.	Noted.
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/024 QUEST 30	We support the aim of a Connectivity Policy which links new routes to the Greenway Network and encourages development which facilitates improvements and extensions where feasible. We reserve the right to comment when detailed policy wording is proposed by Halton Borough Council.	Noted.
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/025 QUEST 31 and 32	Not at this stage. We reserve the right to comment when detailed policy wording is proposed by Halton Borough Council.	Noted.
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/026 QUEST 33and 41	No comment at this stage. We reserve the right to comment when detailed policy wording is proposed by Halton Borough Council.	Noted.
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/027 QUEST 43	Stage 1: Sites should not be excluded on the basis that they are existing built development, such an approach would rule out previously developed land. This stage should be an initial filter that tests sites against criteria in order to identify serious constraints that render them wholly unsuitable for allocation or designation this should include, areas of high flood risk, sites of international or national biodiversity and geological value, located within areas of important archaeological or	It is agreed sites that could be redeveloped should not be excluded, and amendments will be made to the methodology to reflect these comments. It is agreed that a threshold will be applied to the assessment. Again it is agreed that Stage 3 may be improved by splitting it in to several stages including an initial desk based review, site visits, and a consultation stage.

Consultee	Consultee Comment (Summarised)	Council Response
	historical sites and areas located within the HSE inner zone of a hazardous installation. This stage should also only consider larger sites, setting a threshold. It is important that the findings of the Widnes and Hale Green Belt Study are considered at this stage. Stage 2: No comments at this stage. Stage 3 This stage should be a desk based exercise using sustainability criteria, this should be followed by a separate site assessment stage based upon two sources of evidence including a site visit and comments from statutory consultees, stakeholders and the local communities. This stage should be used to identify sites which accord with the policy framework, have the least ecological, landscape and visual impact and, in the case of housing, would best relate to existing built up area of the settlement and would be compatible with surrounding land uses. Consideration of the economic viability and deliverability should also be included. The assessment should also have regard to opportunities for enabling development, where by a development facilitates associated infrastructure and development.	It is considered that economic viability and deliverability are already covered within the methodology and so no further amendments are proposed relating to these factors. There is also a section within the proforma in relation to benefits where it is felt that enabling development could be considered. Therefore although it may be useful to ensure that this is acknowledged it is not felt necessary to make any further amendments in relation to this point.
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/028 QUEST 44	The suggested presentation is acceptable.	Noted.
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited)	It is essential that the evidence base is up to date, some of the existing evidence base needs to be updated. The Assessment should include a further stage which should include a site visit/inspection and comments from statutory consultees.	The age and potential need to update elements of the evidence base will be considered further. The Green Belt Study and Site Assessment work will include desk based and site visit elements and will be published for comment.

Consultee	Consultee Comment (Summarised)	Council Response
00707/4/029 QUEST 45	It should also have regard to economic viability and deliverability.	
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/030 QUEST 46	In general they are appropriate.	Noted.
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/031 QUEST 47	The designations should also include the existing and proposed Green Networks.	The Green Networks will be part of the Green Infrastructure Network designation, and have now been identified as part of the list of designations.
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/032 QUEST 48	Not at this stage. We reserve the right to comment when detailed policy wording is proposed by Halton Borough Council.	Noted.
Mr Mike Hopkins Jones Lang LaSalle (on behalf of Notcutts Limited) 00707/4/033 SECT Appendix C - UDP Policies	Consideration should be given to Green Belt policies, it is essential that the policies are up to date and reflect the NPPF and the findings of the Green Belt Review. It is requested that careful consideration be given to the Green Belt Policies to ensure they are able to deliver the challenges set out in the Core Strategy. In particular the policies should have regard to satisfying the housing targets, which will result in releasing land from the Green Belt.	Consideration will be given to the Green Belt policies to ensure that they are up to date and reflect the NPPF and the circumstances within Halton.
Mr Phil Harper 00874/5/001 QUEST 45	Impact on Residential Amenity - This may be particularly relevant when considering smaller parcels of land where impact on the character and amenity of the existing area can be significant.	Comment noted. The Plan will set out appropriate policies for detailed management of development.
Mr Phil Harper	Land that is retained as open/landscaped & considered to be an integral part of the character/amenity of the residential area and is	A quantitative review of urban greenspace is to be undertaken. This will inform the Site Appraisal process. Designated open spaces will be

Consultee	Consultee Comment (Summarised)	Council Response
00874/5/002 QUEST 47	designated to be retained as so. Small parcels of land that form an integral part of the character/amenity of a residential area that could otherwise be re-allocated for typically 1, 2 or 3 dwellings.	protected by Policy NH6: Open Space and Outdoor Sports Provision.
Mr Phil Harper 00874/5/003 QUEST 14	The policy should be set within the constraints of NPPF conforming to statements 154 & 159, namely 'aspirational but realistic' 'meeting household and population projections'. A net additional household figure of 330 per annum was set by the Halton UDP and represents a realistic level of provision based on past performance. The level of 500 per annum was set without public consultation and resulted in an under-delivery of 930 being brought forward into the current plan period. Targeting 'building 9,930 net dwellings between 2010 and 2028' does not conform to NPPF as it is unrealistic and is significantly in excess of the definitive National household projections included in the SHMA (para 8.3).	The level of housing provision to be planned for was considered at the Core Strategy Examination. However, the introduction of NPPF and the requirement to plan in full of the Objectively Assessed Need for housing, has lead the Council to conclude it must commission additional work to establish a figure for the OAN and to respond to this accordingly.
Mr Phil Harper 00874/5/004 QUEST43	The Site Assessment Methodology should be extended to include assessment against Policy 2 R2 Residential Amenity: retain character of existing residential areas preserve amenity of existing area This is particularly relevant when considering smaller parcels of land.	The site assessment methodology has full regard to surrounding uses and the potential impact on residential amenity. The fact that a small site is currently open and arguably contributes to the character of an area may not in itself be justification for its retention, when weighed against other material considerations.
Mr Phil Harper 00874/5/005 QUEST 12	R3 second bullet aim: "ensure that any extensions do increase the size of the property by more a set percentage more than the original property" surely it should read: "ensure that any extensions do not increase the size of the property by a set percentage more than the original property"	Comment welcomed. This is clearly an unfortunate omission that will be noted and corrected in subsequent drafts.
Mr Phil Harper 00874/5/006 QUEST 13	To identify an allowance for windfall sites.	NPPF Para 48 allows LPAs to make an allowance for windfall provision where this can be justified. It should however be noted that the calculation of 'windfall' has been affected by the move to the system of annual SHLAA supply assessments. The Council will undertake an assessment of the level of Windfall completions and will proceed on the basis of these findings.

Consultee	Consultee Comment (Summarised)	Council Response
Mr Phil Harper 00874/5/007 QUEST 2	There are other statements in the NPPF that are particularly relevant to the Housing Allocations in the Delivery and Allocations Plan and should be included, these being: 154. Local Plans should be aspirational but realistic. 159. Local planning authorities should have a clear understanding of housing needs in their area. They should: ...prepare a Strategic Housing Market Assessment to assess their full housing needs. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which: meets household and population projections; 48. Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens. It is appropriate to test the Local Plan against the 'aspirational but realistic' objective. National projections are for 5,200 households (ref: SHMA 5.8) Local Plan is (an unachievable) 8,000 households over the 16 years, plus 930 households under-delivered in the previous plan period. The allowance for windfall sites should be included as they have historically contributed around 50% of completions.	The level of housing provision to be planned for was considered at the Core Strategy Examination. However, the introduction of NPPF and the requirement to plan in full of the Objectively Assessed Need for housing, has lead the Council to conclude it must commission additional work to establish a figure for the OAN and to respond to this accordingly. It should be noted that historically 'windfall' completions were taken as completions on sites not allocated in a development plan. The use of allowances based on this definition are no longer applicable since the introduction of the annual SHLAA assessment which is intended to quantify potential supply (including windfall sites). . The Council will undertake an assessment of the level of Windfall completions compatible with the SHLAA system and will proceed on the basis if these findings.
Mr P Foster Sustrans 00965/1/001 ALLDALP	How will the council ensure new development does not lead to yet more of a traffic burden for the borough?	The Local Plan cannot prevent people from choosing to own and use a private car, and all development will almost inevitably lead to a degree of additional traffic. The Halton Core Strategy Local Plan encourages journeys to be made by sustainable modes of travel and sets out that that the Council and its partners will support a reduction in the need to travel. This will be achieved through various measures including directing development to sustainable locations, ensuring development is well connected, requiring the production of Travel Plans and Travel Assessments and setting maximum parking standards. These themes are dealt with in more detail through the

Consultee	Consultee Comment (Summarised)	Council Response
		Delivery and Allocations Local Plan Connectivity Policies.
Oliver Varney Equality and Human Rights Commission 01156/1/001 ALL	Please be advised that the Equality and Human Rights Commission (the Commission) will not be responding to this planning consultation. The Commission does not have the resources to respond to all planning applications/ consultations in respect to use of land in England and Wales. However, you and the local authority concerned will have obligations under the Public Sector Equality Duty to identify any adverse impact on a protected group as defined by the Equality Act (2010) and take appropriate mitigation action.	Comment noted.
Hannah Richardson Spawforths (on behalf of Langtree) 01158/2/001 ALL DALP	DSIC supports the general approach and purpose of the Delivery and Allocations Local Plan. In relation to consultation question two, the recently published National Planning Policy Guidance (NPPG) should also be referred to within the document.	Agreed. Reference to the NPPG will be included within the Delivery and Allocations Local Plan.
Hannah Richardson Spawforths (on behalf of Langtree) 01158/2/002 SECT East Runcorn Key Area of Change	DSIC support the East Runcorn Key Area of Change which includes the designation of a Strategic Site encompassing Daresbury Science and Innovation Campus and Daresbury Park. Upon the formation of the joint venture at the end of 2010, DSIC commenced a master planning / visioning process. DSIC have instructed consultants who have collated baseline information and are exploring the options to maximise the development opportunity for the site. Following on from this, the preferred option will be tested by the preparation of a masterplan for the site. DSIC are committed to working with the Council and the key stakeholders / decision makers involved in Halton to fully understand all interested parties views and aspirations to move forward to realise the regeneration vision. Langtree Group PLC have the experience, track record and resources to strategically engage with the relevant bodies to take forward the delivery of the Strategic Location in partnership with Halton Council. DSIC want to maximise the assets and the regeneration opportunity and deliver a new strategic	The Council will be providing details of proposed development, phasing, infrastructure implications and principles of development for each of its Site Allocations as set out in Appendix F. This will not prevent DSIC from preparing a masterplan for the site as part of the ongoing discussions with the Council or to inform any planning application submitted on the site. The Council are not currently proposing to prepare a separate Area Action Plan or SPD for this site or any other.

Consultee	Consultee Comment (Summarised)	Council Response
	employment destination. As such, Policy KA4: East Runcorn should be as flexible as possible and reserve the detail until the masterplanning process is completed. We support many of the key principles set out within Policy CS11 of the Core Strategy however it is considered the level of detail is prescriptive in advance of the masterplan. We consider that potential requirements would be better addressed in an Area Action Plan or Supplementary Planning Document to inform forthcoming planning application's. DSIC wish to build as much flexibility into the Delivery and Allocations Local Plan as the Core Strategy. In addition, Figure 12 in the Core Strategy sets out the specific Strategic Site Allocations within the East Runcorn Key Area of Change and includes Daresbury. Figure 12 details a new, indicative, vehicular route that runs from the A56 through the site to the A558 which is parallel to the Chester to Manchester rail line. Whilst DSIC support the view that a new vehicular route should run through the site, detailed alignments such as this should be capable of being resolved through an Area Action Plan or Supplementary Planning Document and planning application process and not be fixed within the Delivery and Allocations Local Plan. To include and fix the locations of these elements at this stage is too prescriptive as it does not allow any flexibility or consideration of alternative routes and hence should be described in words rather than prescribed on a plan. Whilst the justification for new, indicative, vehicular route is understood, no detailed traffic modelling has been completed and a precise route has not been tested and hence it is requested that some flexibility over the route is provided through appropriate wording within the policy. This will help to enable the deliverability and viability of the link and the wider regeneration to be maximised by allowing the exact route to be determined as the masterplan for the site is developed.	
Mr Alasdair Jones	Policy R1. Residential Development Allocations.	The Council will ensure that the Policy references in Appendix B and

Consultee	Consultee Comment (Summarised)	Council Response
Marrons (on behalf of Redrow Homes Ltd) 01159/4/001 QUEST 12, 13 and 14	Redrow Homes note that the policy reference does not tie in with the policy reference in Appendix B. The latter refers to policy H1. This should be regularised in the draft plan. The proposed policy outline for R1 is deficient and it is considered that the following wording would better express the intentions of the plan in relation to this policy. " To allocate sites for housing to deliver the requirement set out in the Core Strategy taking into account; a. The distribution as set out in policy CS3 of the Core Strategy as between Runcorn and Widnes/Hale. b. Progress towards obtaining that requirement for the two sub-areas. Since 2010. c. The anticipated delivery of new homes at the Daresbury Strategic Site (Policy CS 11) d. A trajectory for the delivery of new homes across the Borough and within the sub-areas including the allocations in the Delivery and Allocations Local Plan. e. The findings of the Green Belt Study. f The need to maintain at all times a five years forward supply of available and deliverable land in accordance with the advice set out in the NPPF and Guidance. g. Contingency, including some flexibility in the forward supply of land to account for unanticipated changes to the market and delays in bringing sites forward."	E, or their equivalents in the Draft DALP, are correct. It is not intended to redraft the Scoping Document to include these points; however, many of them will be taken into consideration as part of the preparation of this policy within the draft DALP.
Mr Alasdair Jones Marrons (on behalf of Redrow Homes Ltd) 01159/4/002 QUEST 24, 25 and 26	Currently there is no policy outline save a reference to the outcome of the Green Belt Study. This approach is not in line with policy CS3 of the Core Strategy, which makes clear that a partial review of the Green Belt will be necessary in the early years of the plan in order to ensure a sufficient forward supply of deliverable development land. The policy outline is therefore deficient. There can be no avoiding the need for some Green Belt land to be allocated for housing at the more sustainable locations highlighted by the study. Other land will have to be safeguarded to meet longer term needs. So the Policy outline for GBI should read "To allocate some land for	It is not intended to redraft the Scoping Document to include these points; however, many of them will be taken into consideration as part of the preparation of this policy within the draft DALP.

Consultee	Consultee Comment (Summarised)	Council Response
	development that is currently shown as Green Belt based on the overall requirement and distribution of new homes as set out in policies CS1 and CS3 of the Core Strategy, and the findings of the Green Belt Study". The policy outline should properly anticipate the as set out in the Core Strategy some Green Belt land will be required to meet housing needs over the plan period and also to be safeguarded to meet needs beyond 2028.	
Catherine Newton Bell Ingram Design Limited (on behalf of Essar Oil UK) 01173/2/001 QUEST 48	On behalf of Essar Oil (UK) Ltd, Bell Ingram monitors the progress of the Development Plans along the route of the North West Ethylene Pipeline Corridor. We take this opportunity to remind you of the need to take the Major Accident Hazard Pipeline into account when assessing proposed Allocations. If you have any concerns that your records may not be up to date then please let us know. We can provide copies of Maps of the pipeline route on CD as shape files or as zipped files which can be emailed.	Comment noted. The Site Assessment Methodology will take into consideration site constraints including Major Accident Hazard Pipelines.
Ms Louise Morrissey Peel Holdings (Management) Ltd 01194/1/001 ALL	I write on behalf of The Bridgewater Canal Company Limited (BCCL). The BCCL is part of the Peel Group and owns and operates the Bridgewater Canal, which passes through the Runcorn and East Runcorn (Sandymoor, Wharford Farm and Daresbury) areas of the Borough. The BCCL is the statutory body responsible for the Bridgewater Canal. The BCCL comments below in respect of the Call for Sites exercise, the draft Infrastructure Plan (The Plan') and in relation to Consultation Question 33 in the Delivery and Allocations Scoping Document, February 2014.	Comment noted.
Ms Louise Morrissey Peel Holdings (Management) Ltd 01194/1/002 SECT East Runcorn	Infrastructure Requirements in East Runcorn: The BCCL welcomes the references to requirements for new and improved bridges over the Canal at/related to Sandymoor, Wharford Farm and Daresbury within Table 1 and within the Infrastructure Delivery Schedule. We note however, that in relation to a number of these, there is reference to delivery risk and viability. Indeed, we are	It is agreed that developments in the vicinity of the Canal should make the most of potential interfaces with the Canal, in terms of leisure, recreation, sustainable transportation and amenity terms. The Council will continue to require S106 as appropriate during the planning application process.

Consultee	Consultee Comment (Summarised)	Council Response
	already aware that the HCA have sought to defer the Windmill Hill Avenue link I gateway through a recent planning application and that a current application by Redrow for housing development in the Central Housing area at Daresbury does not include specific proposals for a new crossing of the canal (at 'H' on the plan on page 107) or improvements to the existing Delph Lane Bridge ('I' on the plan). These and a range of other improvements, including the delivery of a new Marina, are key expectations of the adopted Core Strategy and have previously been seen as critical to the successful development of the strategic sites in East Runcorn. The BCCL encourages the Council to continue to seek to ensure that new development in the vicinity of the Canal always make the most of potential interfaces with the Canal - in leisure, recreation, sustainable transportation and amenity terms. The Canal is an asset that provides a source of open space, leisure and recreation opportunities. It is considered that developments around it should make appropriate contributions to its ongoing enhancement and maintenance. Pooling contributions is an effective way of securing such funds and something that the Council should be actively seeking to do. It is considered important that developments within the Sandymoor / Wharford Farm and Daresbury areas fully embrace the positive strategic opportunities that the Canal, its corridor and its setting present.	
Ms Louise Morrissey Peel Holdings (Management) Ltd 01194/1/003 QUEST	Both the BCCL and Manchester Ship Canal Company have significant concerns about the proposal to reinstate the Runcorn Locks. In addition to the issues acknowledged at paragraph 3.1 .5.9, the BCCL is also concerned about the volume of water that would be taken from the Canal as a consequence of the operation of the locks and the risk of vandalism. BCCL requests that these additional considerations be included within the text of the Plan and within the Infrastructure Provision Schedule. In respect of the Delivery and Allocations Scoping Document we would ask that these concerns are taken account of when the Council considers the proposed policy objective "support the reinstatement of the Runcorn Locks" (Policy Number 35 /	Noted.

Consultee	Consultee Comment (Summarised)	Council Response
	Consultation Question 33).	
Ms Louise Morrissey Peel Holdings (Management) Ltd 01194/1/004 ALL	The Bridgewater Canal is an important asset which should be elevated in importance as a recipient of pooled planning contributions. This would assist the Council when considering planning applications to make sure that it is able to rise to the role in has to play. More determined and stronger language within the Plan and appropriate policy documents is needed to bring about such results from future planning applications for development in the vicinity of the Canal. I hope that the above comments assist the Council and would welcome the opportunity of further discussions with the Council on the issues and opportunities raised above. (See more detailed comments submitted for the Infrastructure Plan 2014 Review for more detail)	Noted.
Ms Louise Morrissey Peel Holdings (Management) Ltd Need to input into Uniform PARA	In respect of the Delivery and Allocations Scoping Document we would ask that these concerns are taken account of when the Council considers the proposed policy objective "support the reinstatement of the Runcorn Locks" (Policy Number 35 / Consultation Question 33).	Noted.
Paul Mullane Halton Housing Trust 01231/2/001 QUEST 2	As the HCA are a major land owner in the Borough and the main funder of Social Housing and supporting house purchases through Home Buy, it may worth having a link into their priorities. There needs to be a strong link to the LEP.	Information in relation to the Homes and Communities Agency and the Local Enterprise Partnership will be included in the next stage of the Delivery and Allocations Local Plan.
Paul Mullane Halton Housing Trust 01231/2/002 QUEST 3	Yes.	Noted.
Paul Mullane Halton Housing Trust 01231/2/003 QUEST 4	Is there any evidence that comes out of the work that has been completed and on-going from the Mersey Gateway Project, if so this could be evidenced?	Reference to the Mersey Gateway Strategy will be included in the next stage of the Delivery and Allocations Local Plan.

Consultee	Consultee Comment (Summarised)	Council Response
Paul Mullane Halton Housing Trust 01231/2/004 QUEST 5	Yes.	Noted.
Paul Mullane Halton Housing Trust 01231/2/005 QUEST 6	Yes.	Noted.
Paul Mullane Halton Housing Trust 01231/2/006 QUEST 7	As mentioned the Borough has a high level of Social Housing therefore the impact of Welfare Reform on demand and house types is important and should be referenced.	The challenges will be updated in the next stage of the preparation of the Delivery and Allocations Local Plan to include reference to social housing requirements.
Paul Mullane Halton Housing Trust 01231/2/007 QUEST 8	Yes.	Noted.
Paul Mullane Halton Housing Trust 01231/2/00 8 QUEST 10	Yes.	Noted.
Paul Mullane Halton Housing Trust 01231/2/009 QUEST 12	Yes.	Noted.
Paul Mullane Halton Housing Trust 01231/2/010 QUEST 13	Welfare Reform needs to be taken into account. As reducing amount of grant funding for social housing and a reducing willingness to build social housing there needs to be consideration to alternative ways to provide social housing.	The Core Strategy already includes a policy on Affordable Housing and a SPD has recently been adopted. It is not proposed to include any further policy in relation to affordable housing in the Delivery and Allocations Local Plan.
Paul Mullane Halton Housing Trust 01231/2/011 QUEST 19	Car parking in shopping areas is critical to maintaining these areas and developing them further.	The Delivery and Allocations Local Plan will contain a policy on parking standards that will ensure that all development is appropriately served.

Consultee	Consultee Comment (Summarised)	Council Response
Paul Mullane Halton Housing Trust 01231/2/012 QUEST 24	Yes.	Noted.
Paul Mullane Halton Housing Trust 01231/2/013 QUEST 28	With the toll bridges, the Runcorn Widnes divide will be magnified and careful consideration of the true impact of this needs to be given, particularly in relation to the shopping centres and how residents move across the Borough.	It should be noted there will be a local user discount scheme that will be free for residents of the Borough it is expected that this will limit the impact for many residents.
Paul Mullane Halton Housing Trust 01231/2/014 QUEST 31	Need to ensure that you are linking to the national housing design standards and the changes in building regs.	The Council tries to ensure that national standards and building regulation requirements are not repeated unnecessarily in planning policy, however, the policy could provide information relating to the importance of meeting these requirements as well.
Paul Mullane Halton Housing Trust 01231/2/015 QUEST 33	Yes.	Noted.
Paul Mullane Halton Housing Trust 01231/2/016 QUEST 37	With a high amount of contaminated land in the Borough, consideration of how HBC can assist in enabling these sites to be economically viable.	The Council is proactive in bidding for funding to bring known contaminated land in the Borough back into beneficial use as and when funding is made available from Government and Europe. The economic viability of remediated sites can be dependent on the proposed end use of the site.
Paul Mullane Halton Housing Trust 01231/2/017 QUEST 42	Yes but we are feed into this process.	This comment is noted.
Paul Mullane Halton Housing Trust 01231/2/018 QUEST 43	Yes.	Noted.
Paul Mullane Halton Housing Trust 01231/2/019	Yes.	Noted.

Consultee	Consultee Comment (Summarised)	Council Response
QUEST 44		
Paul Mullane Halton Housing Trust 01231/2/020 QUEST 45	Could do with the additional areas of: Contamination Demand Pre-app Planning and Highways guidance.	The Site Allocation assessments will include information regarding potential contamination issues and information supplied by the Council Highways department. A planning application history for each site is included however pre-application discussions are commercially sensitive and until an application is submitted this information is not publically available.
Paul Mullane Halton Housing Trust 01231/2/021 QUEST 46	Yes. Need to make sure that local centres have the flexibility to bring on other usages such as housing to help increase population, work opps, etc	Noted.
Mr Steve Matthews Sefton Council 01236/2/001 ALL DALP	Sefton requests that the Delivery and Allocations Local Plan contains a commitment to its participation in a sub-regional Strategic Housing Market Assessment, a sub-regional employment needs study and a sub-regional review of the Merseyside Green Belt in order to identify how the housing and employment needs arising after the current Plan will be able to be met.	The DALP will include reference to the commitment to prepare sub-regional documents as appropriate throughout the document, to identify needs arising after the current plan.
Miss Anna Noble Turley Associates (on behalf of Sainsbury's Supermarkets Ltd) 01242/2/001 SECT Policy TC1	Sainsbury's supports the Council's intention to identify sites to meet the anticipated future retail needs across the Borough (paragraph 7.8). This approach accords with paragraph 23 of the NPPF which requires local planning authorities to: "allocate a range of suitable sites to meet the scale and type of retail . . . development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure sufficient supply of suitable". However, Sainsbury's wish to highlight that the requirement for additional floorspace should be based on an up-to-date evidence base at the time a planning application is made in order to address any changes in circumstances which have occurred since a Borough Retail Study was prepared. The policy wording must also be flexible enough to ensure that retail needs can be met in the event that allocated	Sainsbury's support is noted. The Council will seek to create a suitably flexible policy that meets the requirements of the NPPF.

Consultee	Consultee Comment (Summarised)	Council Response
	site(s) do not come forward development. Any such proposals must be assessed against national policy tests (i.e. sequential and impacts tests, where appropriate).	
Miss Anna Noble Turley Associates (on behalf of Sainsbury's Supermarkets Ltd 01242/2/002 SECT Policy TC2	Sainsbury's considers that the criteria set out at TC2 are generally appropriate. However, the sixth criterion which seeks to "ensure that retail development is compatible with the prime retail function of the area" should be deleted as it repeats the town centre first focus of the NPPF and is, therefore, unnecessary.	It is felt that this particularly criteria is not a repetition of national policy, as it is more than just about a town centre first focus.
Miss Anna Noble Turley Associates (on behalf of Sainsbury's Supermarkets Ltd 01242/2/003 SECT Policy E3	Sainsbury's welcomes the approach of Policy E3 which will permit complementary services and facilities in employment areas. However, further definition of such uses is required. In this regard, retail facilities are employment generating uses and can improve the sustainability of employment areas by providing for people's needs close to where they work.	Further information has been added to the justification for Policy ED3 Complementary Services and facilities within employment areas (para 15.16) to define the uses that will be considered as complementary.
Miss Anna Noble Turley Associates (on behalf of Sainsbury's Supermarkets Ltd 01242/2/004 SECT Policy SD2	Sainsbury's supports the aims of Policy SD2, which is in accordance with the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. However, this policy would be unnecessary unless it provides further local specific guidance above that contained within the Regulations.	Policy SD2 is considered to be in accordance with the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 without being purely repetition of the requirements. Now HC4
Alison Ross 01326/2/001 QUEST 48	Freehold land known as; Norton Crossing Cottage on Red Brow Lane, Norton, has been omitted from your plan. There has been a failure to effectively notify the owner/occupiers of the above land previous to this consultation, of these plans and proposals. Should Wharford Farm land be purchased and developed as proposed here, the Freehold land known as Norton Crossing Cottage and other ownership rights will effectively be 'landlocked' and illegal. The owners of Norton Crossing Cottage do not agree to these plans because they will adversely affect their legal ownership and enjoyment of current property rights held. The property and land was purchased for the country living aspect, outstanding views and wildlife. These proposals will adversely affect this reasonable level of enjoyment and will reduce the value of the property significantly.	All documents in relation to the DALP are available on the Council website and at the Deposit locations and available for anyone to view. A form to sign up to the consultation database is also available on the website and in paper copy from the deposit location which allows anyone to sign up for notifications of local plan document consultations. The comments in relation to Wharford Farm are noted, although these are not necessarily considered to be planning issues, they will be taken into consideration when preparing the more detailed allocations for this site.

Consultee	Consultee Comment (Summarised)	Council Response
	Additionally, the owner of Norton Crossing Cottage is disabled and therefore, the plans to reinforce the bridge and access will hinder and cause unnecessary disruption.	
Diane Clarke Network Rail 01349/1/001 ALL DALP	It is Network Rail's opinion that even with what may be considered as a minor increase in usage at a level crossing, that this is still unacceptable as any increase in usage would also lead to an increase in the level of risk to users. We would also highlight that an increase in level crossing neighbours may lead to an increase in both wilful and unconscious unsafe acts, such as rushing to get across before a train passes, or a dog walker chasing after a loose pet on the line from the crossing, or simply crossing with too little time, instances such as this would not be acceptable at the level crossings. We would therefore wish to see a policy within the Local Plan specifically addressing the issue of level crossings. Halton Council have a statutory responsibility under planning legislation (Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) Order, 2010) to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway.	The level crossing at Norton / Red Brow Lane will be considered as part of the policy in relation to the East Runcorn Key Area of Change. It is likely that the development proposed in the adopted Core Strategy for this area and provided in more detail in the Delivery and Allocations Local Plan will increase the numbers of people in this area. The level crossing on the freight line at Widnes Waterfront will be considered as part of the policy in relation to the Widnes Waterfront Key Area of Change.
Diane Clarke Network Rail 01349/1/002 SECT 8	That any proposal going forwards includes a transport assessment which should include a section on the impact of increased users (both vehicular or pedestrian) at any level crossings within the area, or which may be impacted by diversionary routes or new highways leading to or from the developments	The level crossings at Norton / Red Brow Lane and Widnes Waterfront will be considered as part of the policy in relation to the Key Areas of Change, these will both include reference to the need for a Transport Assessment that includes a section in relation to the impact of the increased users or the provision of alternatives.
Diane Clarke Network Rail 01349/1/003 SECT 8	Where a proposal has an increase in type and volume of user at a level crossing, Network Rail would seek closure of that crossing. a. Where feasible we would seek replacement of the level crossing with a suitable footbridge i. We would seek a developer contribution towards the funding of the footbridge either via CIL, S106 or a unilateral undertaking. Where proposals are large scale we believe that the developer should provide full funding for the footbridge, for smaller proposals a	The level crossings at Norton / Red Brow Lane and Widnes Waterfront will be considered as part of the policy in relation to the Key Areas of Change, these will both include reference to the text suggested by Network Rail.

Consultee	Consultee Comment (Summarised)	Council Response
	contribution would be sort in proportion to the development. ii. Network Rail would design and construct the footbridge iii. The developer would submit a planning application for the footbridge. iv. Furthermore we would need a commitment from the council that they are supportive in principle of the closure of the relevant level crossing and construction of a footbridge v. Network Rail would have liability for the maintenance of the footbridge unless agreed otherwise b. Where replacement with a footbridge is not feasible we would seek a diversion order of, for example, a public footpath - which would include discussions with the LPA, Highways and PROW teams. i. The developer will be responsible for the preparation and submission of the diversion orders c. The developer and the council agree that only a specific percentage of dwellings are constructed prior to the installation of any footbridge, and the closure of the relevant level crossing, which should be a condition of approval	
Diane Clarke Network Rail 01349/1/004 SECT 8	We believe that developer contributions should be included as part of the proposal preparations in the same way as consideration is given to funding towards local facilities or highways works.	The level crossings at Norton / Red Brow Lane and Widnes Waterfront will be considered as part of the policy in relation to the Key Areas of Change.
Diane Clarke Network Rail 01349/1/005 SECT 8	Where growth areas or significant housing allocations are identified close to existing rail infrastructure it is essential that the potential impacts of this are assessed. Many stations and routes are already operating close to capacity and a significant increase in patronage may create the need for upgrades to the existing infrastructure including improved signalling, passing loops, car parking, improved access arrangements or platform extensions. As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions or CIL contributions to fund such railway improvements; it would also be appropriate to require contributions towards rail infrastructure where they are directly required as a	Amendments will be made to address the issues raised by Network Rail. Text in relation to Transport Assessments will be included to ensure that the impacts of the development are considered on all parts of the transport network. Potential for developer contributions to mitigate for impacts of development on rail infrastructure will be included within the connectivity policies.

Consultee	Consultee Comment (Summarised)	Council Response
	result of the proposed development and where the acceptability of the development depends on access to the rail network. The National Planning Policy Framework states that councils should, 'work with . . . transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development . . . or transport investment necessary to support strategies for the growth of . . . other major generators of travel demand in their areas.' Also, 'encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plan, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.' The likely impact and level of improvements required will be specific to each station and each development meaning standard charges and formulae may not be appropriate. Therefore in order to fully assess the potential impacts, and the level of developer contribution required, it is essential that where a Transport Assessment is submitted in support of a planning application that this quantifies in detail the likely impacts on the rail network. Developer contributions should be sort to mitigate the impacts of increased footfall at railway stations as a result of new residential or commercial development. The need to mitigate the impacts of increased footfall at railway stations with enhanced services (e.g. CCTV, CIS, increased car parking) should be considered as part of the S106 contributions in the same way as local services or highways works.	
Mr Dave Dickinson Highways Agency 01351/1/001 ALL DALP	The HA has no specific comments on the document.	Noted.
Ginny Hall Mono Consultants on behalf of Mobile Operators Association	We would take this opportunity to comment that we consider it important that there is a specific telecommunications policy within the emerging Local Plan.	The Delivery and Allocations Local Plan Scoping Document states that a policy will be included regarding the Delivery and Communications Infrastructure.

Consultee	Consultee Comment (Summarised)	Council Response
01353/1/001 ALL DALP		
Ginny Hall Mono Consultants on behalf of Mobile Operators Association 01353/1/002 ALL DALP	It is recognised that telecommunications play a vital role in both the economic and social fabric of communities. National guidance recognises this through Section 5: "Supporting high quality communications infrastructure" of National Planning Policy Framework (March 2012) which provides clear guidance as to the main issues surrounding telecommunications development.	Comment noted. The Delivery and Allocations Local Plan Scoping Document states that a policy will be included regarding the Delivery and Communications Infrastructure.
Ginny Hall Mono Consultants on behalf of Mobile Operators Association 01353/1/003 QUEST 27, 28 and 29	As indicated above, the formulation of policy does not exist in isolation and there are numerous documents which will affect the formulation of any telecommunications policy, the most important of these being NPPF. On this basis we would suggest that a concise and flexible telecommunications policy should be included within the emerging Local Plan. Such a policy should give all stakeholders a clear indication of the issues that telecommunications development will be assessed against. We would suggest a policy which reads; "Proposals for telecommunications development will be permitted provided that the following criteria are met: - (i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area; (ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building; (iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority. (iv) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest. When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical	Agree that the policy should give all stakeholders a clear indication of the issues that telecommunication development will be assessed against. Suggested policy wording will be considered in the draft policy

Consultee	Consultee Comment (Summarised)	Council Response
	limitations of the technology." We would consider it appropriate to introduce the policy and we would suggest the following; "Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With the growth of services such as mobile internet access, demand for new telecommunications infrastructure is continuing to grow. The authority is keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and siting equipment on existing tall structures and buildings."	
Mr Anthony B Northcote Planning and Local Authority Liaison, Coal Authority 01354/1/001 ALL DALP	Coal Resources: As you will be aware, the Halton Borough Council area contains only a tiny area of coal resources which are capable of extraction by surface mining operations. The Borough is however underlain by deep coal resources. There are licences in existence for the extraction of coal bed methane within Halton. Coal Mining Legacy: As you will be aware, the Halton Borough Council area there is only very limited mining legacy, there are no recorded mine entries but a single mine gas site is recorded right on the very north-eastern edge of the plan area. Land instability arising from mining legacy is therefore unlikely to occur.	Comment noted.
Mr Anthony B Northcote Planning and Local Authority Liaison, Coal Authority 01354/1/002 QUEST 39, 40 and 41 Minerals	The proposed Policy M2 should set out a policy framework which allows for the extraction of conventional and unconventional hydrocarbons, including coal bed methane and other technologies such as underground coal gasification. The policy should take account of national planning policy in paragraph 147 of the NPPF, and the new advice in the Planning Practice Guidance.	Comment noted. The suggested policy framework and national policy will be taken into consideration when drafting the policy.
Sabaa Ajaz	United Utilities requests that the LPA robustly considers the	Further information will be provided in the Flood Risk policy in

Consultee	Consultee Comment (Summarised)	Council Response
United Utilities 01355/1/001 QUEST36,37 and 38 Flood Risk and 30,31 and 32 Design of Development	availability of alternatives to the public sewer for sites which are proposed to be developed. This should be a consideration of policy and the subsequent application process. Applicants should be required by policy to thoroughly investigate the surface water hierarchy on sites identified for development in the plan period (and beyond). It is most appropriate to establish key site specific drainage principles as part of policy where it is possible to identify the most sustainable form of approach to surface water drainage. Any surface water discharge should be attenuated to the most appropriate level having regard to existing site conditions including an allowance for climate change and this should be reflected in policy.	relation to the surface water hierarchy, and this will also be given consideration with the site allocations.
Sabaa Ajaz United Utilities 01355/1/002 QUEST36,37 and 38 Flood Risk and 30, 31 and 32 Design of Development	It is important that we continue to work with landowners and developers in limiting the extent of surface water entering the public sewerage system as a result of new development to ensure we are able to most appropriately manage the impact of growth on drainage infrastructure. United Utilities therefore requests that all new development must discharge surface water to one of the following, listed in order of priority: 1. continue and / or mimic the site's current natural discharge process; 2. direct discharge to a watercourse or to an on-site suitable form of Sustainable Urban Drainage System (SUDS); 3. direct and controlled discharge to a surface water sewer or controlled discharge into a combined sewerage network.	The Council will seek to incorporate United Utilities suggested discharge priorities within Policy PR5 Flood Risk.
Sabaa Ajaz United Utilities 01355/1/003 QUEST 36, 37 and 38 Flood Risk and 30, 31 and 32 Design of Development	It should be a clear requirement of allocated and windfall sites that all new development should manage surface water in the most sustainable, effective and appropriate way. We request that developers / applicants clearly demonstrate with evidence, how they have applied the drainage hierarchy set out in Building Regulations 2010 H3 Rainwater Drainage (as outlined above) as part of the consideration of development sites.	The Council do not wish to repeat national policies in their local plan, however, further wording will be incorporated to ensure that applications are supported by appropriate evidence in relation to the drainage hierarchy.
Sabaa Ajaz United Utilities 01355/1/004 QUEST36,37 and 38	In some circumstances, it may be necessary to coordinate the delivery of new development with the delivery of future infrastructure. United Utilities' requests developers / landowners engage with us at an early stage to understand the impact of	The Council will include wording with regard to United Utilities role in relation to site drainage and infrastructure and the need for applicants to keep them informed.

Consultee	Consultee Comment (Summarised)	Council Response
Flood Risk and 30,31 and 32 Design of Development	development on existing infrastructure with details of their drainage strategy for development sites. United Utilities requests developers produce drainage strategies of each phase of development in agreement with the LPA, United Utilities and the Environment Agency. It is prudent that developers and landowners keep United Utilities informed of realistic and achievable delivery timescales for development and approach infrastructure in a coordinated manner. It will be necessary to ensure drainage infrastructure is delivered in a holistic and co-ordinated manner as part of an overall strategy between phases of development and between developers. The delivery of development as part of an overall strategy and the early receipt of details allows the impact of development on infrastructure to be determined with improved accuracy.	
Emily Hrycan English Heritage 01356/1/001 QUEST Question 2	In terms of the plans and policies identified, this needs to cover all those relevant at a national and local level that would have a direct bearing for the historic environment. The Local Plan scoping report does not appear to make reference to any in relation to this. A sound local plan should be based on an up-to-date evidence base which includes information on the historic environment. English Heritage has produced a document on Strategic Environmental Assessments, which includes useful information on the key national and local policies and evidence for the historic environment that you might find helpful. This can be found at http://www.english-heritage.org.uk/publications/strategic-environmental-assessmentsustainability-appraisal-historic-environment/ .	The Council will reference the NPPF and NPPG as part of the National Context, the adopted Core Strategy and Sustainable Community Strategy as part of the Local Context and will include the Green Infrastructure Plan and the proposed Local List within the Local Evidence Base. The DALP will make reference to any other locally applicable documents stated within the English Heritage guidance (pgs 5 and 6) as appropriate within the relevant sections. (Strategic Environmental Assessment, Sustainability Appraisal and The Historic Environment, English Heritage (2013)).
Emily Hrycan English Heritage 01356/1/002 QUEST 2	One of the twelve principal objectives of planning under the NPPF is the conservation of heritage assets for the quality of life they bring to this and future generations (NPPF, Paragraph 17). Conservation means maintaining what is important about a place and improving this where it is desirable. It is not a passive exercise. It requires a plan for the maintenance and use of heritage assets and for the delivery of development within their setting that will make a positive contribution to local character and distinctiveness.	Commented noted.
Emily Hrycan English Heritage	In terms of policies, it is clear that the NPPF expects plans to include detailed policies, which will enable a decision maker to determine a	The Council seek to include detailed policies to enable a decision

Consultee	Consultee Comment (Summarised)	Council Response
01356/1/003 SECT 7	planning application.	maker to determine a planning application.
Emily Hrycan English Heritage 01356/1/004 SECT 7 and 8	Key issues to be considered are (not wholly comprehensive): • Undesignated heritage assets (including significance of, setting, extensions, demolition, alterations, change of use, etc) • Designated heritage assets (including significance of, setting, extensions, demolition, alterations, change of use, etc) • Archaeology including remains of less than national importance. • Conservation areas • Registered parks and gardens • Heritage at Risk • Important views and vistas • Landscape character • Local character and distinctiveness • Individual settlements • Historic shopfronts and advertisements • Public realm • Design • Information to accompany an application.	This comment is noted, and the Council will seek to ensure all of these points are considered.
Emily Hrycan English Heritage 01356/1/005 QUEST 42	The NPPF makes it clear that the significance of heritage assets can be harmed through development within their setting. There is a requirement in the Town and Country Planning Act 1990 that 'special regard' should be had to the desirability of preserving listed buildings, their setting or any features of special architectural or historic interest which they possess. It is also the duty of the Council to preserve or enhance the character or appearance of its conservation areas and their setting. Where potential development sites appear to include non-designated assets including the possibility for archaeology, their potential should be investigated and retention/exploration should be promoted.	The Council will include greater reference to the settings of heritage assets. The Council will include greater reference to undesignated heritage assets including those with the potential for archaeology.
Emily Hrycan English Heritage 01356/1/006 QUEST 42	Consequently, before allocating any site there would need to be some evaluation of the impact, which the development might have upon those elements that contribute to the significance of a heritage asset including their setting.	This will be included within the Site Assessment.

Consultee	Consultee Comment (Summarised)	Council Response
Emily Hrycan English Heritage 01356/1/007 QUEST 42	The selection of sites for development needs to be informed by the evidence base and the Plan should avoid allocations those sites which are likely to result in harm to the significance of the heritage assets of the Plan area. Where adverse impacts are unavoidable, the plan should consider how any harm might be mitigated. This could include measures such as a reduction of the quantum of development at a site, amending the types of development proposed or locating the development within another part of the site allocation. Such initiatives need to be fully justified and evidenced to ensure that such measures are successful in reducing identified harm.	The Council will take heritage assets into consideration when allocating sites including consideration of potential measures to reduce or mitigate any potential harm.
Emily Hrycan English Heritage 01356/1/008 QUEST 42	The allocation of sites for development may also present better opportunities for the historic environment. For example, new development may better reveal the significance of heritage assets or may provide an opportunity to tackle heritage at risk.	The Council will take heritage assets into consideration when allocating sites including consideration of potential to reveal the significance of the asset or to tackle heritage at risk.
Emily Hrycan English Heritage 01356/1/009 QUEST 42	Where relevant, policies for allocated sites may need to make reference to identified historic environment attributes in order to guide how development should be delivered. For example, this might require the Policy to include detailed criteria or providing supplementary information with the supporting text.	Site Allocations will include reference to historic environment attributes where appropriate.
Emily Hrycan English Heritage 01356/1/010 QUEST 42	Chapter 8 of the scoping report sets out the approach included within the site allocations methodology. With regards the historic environment, there are the following comments to make: - o Welcome the use of reference numbers that clearly allow identification of the site within the plan and the supporting text - o Red Line Boundary - this should be at an appropriate scale to clearly identify the boundary. - o Site description - this should clearly identify designated and undesignated assets. This could further be enhanced through identification of constraints on a plan - o Proposed development and indicative development capacities -	The Council will ensure that the red line boundary is at appropriate scale to identify the boundary. The Council will look to identify any designated and undesignated sites within the site description. The Council will seek to identify sites where a heritage impact assessment will need to be undertaken in order to confirm the potential capacity of the site. The Council will ensure that any heritage assets and their settings are taken into account as part of the Principles of Development.

Consultee	Consultee Comment (Summarised)	Council Response
	where development affects the significance of a heritage asset, there will be a need to undertake a heritage impact assessment to determine whether development is appropriate and to inform the type of development suitable for the site. The Local Plan should not determine the type of development, set densities etc. prior to this assessment being undertaken. Without which, the Local Plan would not put forward a positive strategy for the conservation and enhancement of the historic environment and would therefore not meet the requirements of the NPPF. o Principles of Development - the Plan should be informed by a thorough assessment of the historic environment, where the significance may be affected by the allocations of a site for development. This should inform the principles for the future development of any site, where is it considered it does not harm the significance of a heritage asset.	
Emily Hrycan English Heritage 01356/1/011 QUEST48	Strategic cross boundary issues that affect the historic environment are issues that can only be effectively addressed at a larger than local scale and may cover the issues listed below, this is not an exclusive list and strategic issues will have to considered on an area by area basis. • extensive designated and non-designated heritage assets, e.g. Hadrian's Wall WHS, historic landscapes, • major heritage based tourism attractions, the management of which may impact upon more than one Authority, e.g. Stonehenge • major quarries for building and roofing stone, e.g. Portland stone • major changes to green belt which effect the preservation of the setting and character of historic towns • major development proposals likely to affect important heritage assets in a neighbouring authority, e.g. major urban extensions, infrastructure proposals These strategic issues will not necessarily and always be the same as the strategic polices for the protection and enhancement of the	This comment is noted.

Consultee	Consultee Comment (Summarised)	Council Response
	historic environment included in a local plan but are likely to be a sub-set of them. Indeed local circumstances may indicate that strategic approaches may not always be needed. The sustainability appraisal scoping report should help to identify what is important for a particular plan area.	
Emily Hrycan English Heritage 01356/1/012 SECT Appenidx G	Appendix G fails to refer to heritage assets in the list of constraints particularly those of the highest significance (Grade I and II* and scheduled monuments). This should be amended to include this. The Stage 3 site assessment should also include heritage assets which may not be within the site but where their significance and setting may be affected by the allocation of the site for development.	Heritage is included within the Physical Constraints in Appendix G, where it lists potential elements that may be considered including Listed Buildings, Historic Parks, Local Listing and Non-designated heritage assets. Heritage is also included within the Designations in Appendix G, where it lists potential elements such as Conservation Areas. The Council will look to ensure the significance of the asset is noted and that the setting of assets outside of sites is also considered.
Emily Hrycan English Heritage 01356/1/013 ALLDALP	English Heritage strongly advises that you engage conservation, archaeology and urban design colleagues at the local and county level to ensure you are aware of all the relevant features of the historic environment and that the historic environment is effectively and efficiently considered as part of the allocation of any site, development management policies and in the preparation of the SEA. They are also best placed to advise on local historic environment issues and priorities, including access to data held in the HER (formerly SMR). They will be able to provide you with the Historic Environment Records for the area including any relevant studies, and ensure a joined-up and robust approach is undertaken.	The Council will consult with appropriate colleagues in the drafting of policies in relation to heritage assets.
Andrew Teage DTZ 01358/1/001 ALLDALP	Royal Mail are keen to be involved in the Local Plan preparation process and to review land use and development proposals where they might affect their property and land interests or where they may have an impact upon service delivery. Royal Mail has a statutory duty to provide efficient mail sorting and delivery for Halton Borough Council's administrative area. Royal Mail's collection and delivery service in relation to this policy direction is provided from the following property: - Runcorn Delivery Office, Crown Gate, Runcorn, WA7 1AA (Royal	Noted.

Consultee	Consultee Comment (Summarised)	Council Response
	Mail reference BE2492)	
Andrew Teage DTZ 01358/1/002 QUEST15	The Royal Mail supports the objectives of policy number 8 E2: New Employment Development and policy number 9 E3 Complementary Services and Facilities within Employment Areas, specifically the following provisions: • identify the appropriate employment uses within designated employment zones; • ensure development is compatible with existing and proposed surrounding uses; • require development to consider design and access issues and where possible alleviate issues. This may include landscape buffer zones to separate uses, measures to reduce amenity issues and screening of storage areas; and • ensure that complementary services and facilities do not impact on local employment or the local economy. The reason behind this support relates to the current location of the Runcorn Delivery Office within a Primarily Employment Area (UDP Proposals Map). It is considered that this employment allocation serves to safeguard Royal Mail's operations so that they will not be prejudiced and can continue to comply with their statutory duty to maintain a 'universal service' for the UK pursuant to the Postal Services Act 2000. It is also important to consider that locating Delivery Offices within employment areas and/or surrounding them with other employment uses addresses wider amenity considerations given that the majority of employment generating uses in such areas are insensitive to the Royal Mail's hours of operation and noise impact. This approach accords with adopted Government guidance set out in the National Planning Policy Statement (NPPF) (March 2012), which advises at paragraph 21 that local planning authorities should support existing business sectors.	Comment noted.
Andrew Teage	DTZ on behalf of Royal Mail submitted a representation in March	This comment is noted. It is hoped that policies in relation to amenity

Consultee	Consultee Comment (Summarised)	Council Response
DTZ 01358/1/003 QUEST19 & 20	2013 in relation to Halton Borough Council Strategic Housing Land Availability Assessment 2011/12 (this is submitted alongside with this response for information and reference). This representation was in relation to SHLAA site 170 'Job Centre Brosley House Widnes Rd, Widnes'. DTZ's review of the SHLAA showed that site 170 is the site of the Widnes Delivery Office (3 Widnes Road, WA8 6AA - Royal Mail reference BE2490). The SHLAA Schedule identifies the site as being suitable, available and achievable for 5 residential units in the Council's 6 - 10 year housing land supply. Further to this representation it is noted that the adopted Core Strategy at Appendix 2 defines the boundary for Widnes Town Centre, which encompasses the Widnes Delivery Office. On the current UDP Proposals Map, Widnes Delivery Office is located within an area allocated as an Action Area (RG2 Action Area 2 Central Widnes), the objective of which is to support and enhance the vitality and viability of Widnes Town Centre. This means that the relevant policy outline within the Delivery and Allocations Scoping Document (DALP) is that of Town, District and Local Centres Policies. The policy outline and associated aims promote a range of appropriate land uses for the town centre. Residential land use is not specifically identified. Royal Mail would support a position that does not specifically reference residential development within any final policy wording, given the potential conflict between such a sensitive land use and the operations undertaken at Royal Mail Delivery Offices, which has previously been raised within DTZ's letter of representation to the 2011/12 SHLAA (March 2013).	will help to address this address.
Andrew Teage DTZ 01358/1/004 QUEST19 & 20	In this context, and also within the context of the wider mix of land uses identified within the Town Centre policy outline, DTZ on behalf of the Royal Mail, wish to re-emphasise the need to protect the above Royal Mail sites from development that may adversely affect mail services provided from them. Should any land surrounding Royal Mail's sites be redeveloped, it would be vital that any new uses be	The Council will take the concerns of the Royal Mail into account when assessing sites for development as part of the Site Assessments.

Consultee	Consultee Comment (Summarised)	Council Response
	designed and managed so that they are both cognisant of and sensitive to Royal Mail's operations. It should be noted that at present the Widnes Delivery Office is operational and Royal Mail currently have no plans to close or relocate it. Should the site come forward as a potential redevelopment site then it is essential that as the site is operational, the policy and/or supporting text to the inclusion of this site explicitly state that the re-provision / relocation of Royal Mail's operations will be required prior to their redevelopment. This will ensure that Royal Mail's operations will not be prejudiced and that they can continue to comply with their statutory duty to maintain a 'universal service' for the UK pursuant to the Postal Services Act 2000. Furthermore, in order for Royal Mail's site to be brought forward for redevelopment, relocation will need to be viable for and commercially attractive to Royal Mail. The proceeds from the disposal of their site will need to yield both sufficient values to fund the purchase and fit-out of a new site and the relocation of their operations thereto. There will also need to be a commercial attractiveness that would incentivise the business to relocate the operations. In addition, it would be essential that any new facility is provided prior to the demolition of that existing, to ensure Royal Mail's continuity of service. This approach accords with adopted Government guidance set out in the National Planning Policy Statement (NPPF) (March 2012) which advises that local planning authorities should help achieve economic growth by planning proactively to meet the development needs of business and support an economy fit for the 21st century. The NPPF also advises that local planning authorities should support existing business sectors, taking account of whether they are expanding or contracting. It also states that policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances (Paragraphs 20-21).	

Consultee	Consultee Comment (Summarised)	Council Response
Harry Spawton Gerald Eve LLP 01360/1/001 ALLDALP	Cross boundary working between Councils is essential, particularly when dealing with the production of new planning policies and continued monitoring of related issues. This letter of representation highlights the importance of the Duty to Cooperate between Councils and resulting Soundness of the Delivery and Allocations Scoping Document. This is relevant to the Jaguar Land Rover Halewood site in terms of both its location and importance within the region. The Council will need to provide evidence to confirm effective cooperation with neighbouring local authorities and statutory providers with regards to how cross-boundary issues have been planned for.	Comment noted.
Harry Spawton Gerald Eve LLP 01360/1/002 QUEST6	Jaguar Land Rover believes that policies and aspirations to assist businesses with growing and planning for their future in the region are positive, and supports the challenges that the Council has set itself.	Support welcomed.
Harry Spawton Gerald Eve LLP 01360/1/003 QUEST15, 16 and 17	In terms of the direction of new planning policies on employment, Jaguar Land Rover does not currently have any immediate requirements for new sites outside of the immediate vicinity of the Halewood plant. However, as highlighted above, manufacturing output is predicted to continue to rise. The business is expected to expand in response to the increasing demand for vehicles from the overseas market. Jaguar Land Rover needs to ensure that it can adapt quickly to external forces such as technological advances and changes in customer demand. The availability of large employment sites across the North West of the country which are allocated within Council's Development Plans are essential. Allocation of suitable employment sites will assist companies such as Jaguar Land Rover in remaining competitive by both reducing delays in searches for expansion sites and reducing timescales for obtaining planning permission. Jaguar Land Rover seeks to ensure that emerging employment	The Council will seek to allocate an appropriate range and variety of employment sites, and provide appropriately flexible policies.

Consultee	Consultee Comment (Summarised)	Council Response
	policies at Halton Borough Council retain flexibility to allow for the ease of location of large manufacturing companies to sites within its boundary. At the same time, the allocation of suitable large sites with modern infrastructure and utilities is sought to also assist with this.	
Harry Spawton Gerald Eve LLP 01360/1/004 SECT Site Allocations	It is noted that a residential proposal shown to be located directly to the south east of the Halewood plant has been proposed to the Council by Peel Holdings. It is expected that this proposal will potentially be debated through the production and examination of the Delivery and Allocations Local Plan. The location of residential and employment uses in close proximity of each other reflect the principles of sustainable development which are promoted through the NPPF. At the same time though, NPPF states that planning policies and decisions should aim (inter alia) to: "recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established." (paragraph 123) Jaguar Land Rover would not want to restrict either its existing operation or opportunities for expansion (including potential restrictions on capacity of surrounding road networks) within close proximity of the Halewood site. As set out above, the company has to retain the potential to evolve at a rapid rate to react to changing external forces. As a large employer within the region, it is particularly important that other planning uses such as residential do not encroach on the operation of the plant, or impact on the local road network which Jaguar Land Rover relies on for deliveries. Speke Road does act as a barrier between the Halewood plant and proposed Mersey Edge site, but Jaguar Land Rover would seek confirmation that any progression of a land use allocation or planning application for residential use on the Mersey Edge site would not impact on its continued use of the Halewood site, or potential for	This comment is noted. It is hoped that policies in relation to amenity will help to address this issue. It is also expected that any allocations in this area would include principles of development in relation to appropriate visual; or noise related buffers and attenuation measures.

Consultee	Consultee Comment (Summarised)	Council Response
	expansion into land to the east.	
John King Natural England 01361/1/001 ALLDALP	As a reminder the plan must be screened with respect to The Conservation of Habitats and Species Regulations 2010 to determine whether an Appropriate Assessment is required. In addition, the screening needs to consider not just the potential impacts of this plan but also any in-combination effects when taking account of other plans and projects, including those in relevant authorities beyond the boundary. We suggest that the process of HRA runs in parallel to the development of the plan (i.e. the three stages of issues & options, preferred options, publication). If the HRA process is initiated from the outset, its findings from earlier stages can be used to inform subsequent stages, e.g. preferred options. Particular consideration will need to be given to water quality impacts on downstream water quality sensitive European designated sites. It is worth noting water quality issues considered in relation to the neighbouring Cheshire West and Chester Local Plan concerning the following European designated sites: - Mersey Estuary Special Protection Area (SPA) & Ramsar - Dee Estuary Special Area of Conservation (SAC)/SPA & Ramsar - River Dee and Bala Lake SAC - Liverpool Bay SPA - Mersey Narrows & North Wirral Foreshore SPA/Ramsar site	Comments noted. Agree that the process of HRA runs parallel to the development of the Delivery and Allocations Local Plan.
John King Natural England 01361/1/002 QUEST4	Natural England would like to see consideration of the Draft Liverpool City Region Green Infrastructure Framework which is being developed to maximise the benefits that the city region can gain from the sustainable management of its natural environment.	Agree that consideration is given to the Draft Liverpool City Region Green Infrastructure Framework.
John King Natural England 01361/1/003 QUEST10	We welcome the inclusion of these strategic objectives, in particular objectives 9, 10 and 12 which we consider helps to define the overarching approach to protecting and enhancing the natural environment and addressing climate change in the Plan.	Support welcomed.
John King Natural England 01361/1/004	While we welcome the inclusion of Policy NH5 'Protection of Green Infrastructure' in section 7.17 we would like to see a cross reference in the Sustainable Design policies and consideration of the integration	Agree that there should be a cross reference between NH5: Protection of Green Infrastructure and the Sustainable Design policies regarding the integration of green infrastructure into the

Consultee	Consultee Comment (Summarised)	Council Response
QUEST31	of green infrastructure into the design of development.	design of development.
John King Natural England 01361/1/005 QUEST33	Natural England welcome the emphasis on locally important habitats, wildlife sites and geological sites in policy NH2 'Nature Conservation' but would like to see a cross reference to the hierarchy of designated sites in Core Strategy Policy CS20 in the supporting text. In addition we would like to see a commitment to minimising impacts on biodiversity and geodiversity, in line with para 117 of the NPPF as well as a more positive ambition to seek to achieve net gains in biodiversity in line with para 109 of the NPPF. Further information can be found in Standing advice for protected species. We note and welcome the protection of open countryside in policy NH4 but would like a reference to the broader protection of landscapes in the supporting text including a cross reference with bullet points four and five of Core Strategy policy CS20. We particularly welcome and support the ambition to identify appropriate financial contributions towards green infrastructure and support cross boundary working in policy NH5.	Agree that a cross reference to the hierarchy of designated sites in the Core Strategy in the justification of policy NH2 would be appropriate. A new policy has been included within the DALP to provide protection to the landscape.
John King Natural England 01361/1/006 QUEST40	We would like to see consideration of the green infrastructure and biodiversity action plan (BAP) habitat gains that can be achieved from mineral sites restoration.	Agree that there should be green infrastructure and BAP habitat gains achieved from mineral site restoration.
John Moran Health and Safety Executive (HSE) 01362/1/001 SECT Appendix A	I note that the requirement in Para. 172 of the National Planning Policy Framework NPPF is omitted from Appendix A the DALP consultation document. Appendix A sets out NPPF requirements relevant to the DALP, cross referenced to corresponding Local Policy(s). The HSE recommends that the requirements of NPPF Para.172 are included in Appendix A.	The requirements of the NPPF para.172 will be included within the next iteration of Appendix A. The Council will seek to base policies on up-to-date information on the location of major hazards and on the mitigation of the consequences of major accident hazards.
John Moran Health and Safety Executive (HSE)	We have concluded that there is the potential for proposed land allocations as described in your DALP evidence documents to encroach on consultations zones. For example, the Strategic Housing	The Council will contact HSE as part of the work on the Site Assessments and will supply appropriate GIS information at this point.

Consultee	Consultee Comment (Summarised)	Council Response
01362/1/002 SECT Site Allocations	Land Availability Assessment 2012 (SHLAA 2012) identifies potential encroachments on the consultation zones of Ineos Chlor Limited, The Heath, Runcorn (HSE Ref. No: H0391). The following housing allocations are in the inner zone for example: a. Site Ref: 272 - Land opposite Castner Avenue, Runcorn b. Site Ref: 287 - Rear of 14-16, Heath Road, Runcorn c. Site Ref: 287 - Land at Heath Business Park, Heath Road South, Runcorn It is noted in the SHLAA 2012 Site Schedule that the sites within HSE consultation zones are acknowledged. As your plan develops, the most accurate and efficient way for HSE to make a representation where multiple allocations are proposed is to analyse the Geographical Information System (GIS) data for all the potential allocations, e.g. the GIS allocation data for any relevant DALP evidence document that is taken forward into the Draft Local Plan. Detailed analysis and the associated advice on the extent of encroachment is outside the scope of this initial response to the DALP scoping document. It is recommended therefore that at the Draft Local Plan consultation stage that you supply HSE with GIS data for the proposed land allocations.	
John Moran Health and Safety Executive (HSE) 01362/1/003 SECT Designations	The HSE recommends that where there are major hazard installations and MAHPs within the area of your local plan, that you mark the associated consultation zones on a map. This is an effective way to identify the development proposals that could encroach on consultation zones, and the extent of any encroachment that could occur. The proposal maps in site allocation development planning documents may be suitable for presenting this information. We particularly recommend marking the zones associated with any MAHPs, and the HSE advises that you contact the pipeline operator for up-to-date information on pipeline location, as pipelines can be diverted by operators from notified routes. Most incidents involving damage to buried pipelines occur because third parties are not aware of their presence.	As major hazard installations and MAHPs may change over the plan period it is possible that these elements may be indicatively notated on the plan with a note that these should be checked against the current information held by the HSE or the Council. This will allow for the policy to be more flexible and to allow for changing circumstances as business needs change.

Consultee	Consultee Comment (Summarised)	Council Response
John Moran Health and Safety Executive (HSE) 01362/1/004 QUEST 36, 37 and 38	This DALP consultation provides HSE with the opportunity to again raise longstanding concerns in the matter of Halton Borough Council's Risk Policy(s), specifically Core Strategy Local Plan Policy CS23: Managing Pollution and Risk, UDP PR12 Development on Land Surrounding COMAH Sites & Supplementary Planning Document (SPD) Planning for Risk October 2009. Certain aspects of Halton's Risk Policies Core Strategy Local Plan Policy CS23: Managing Pollution and Risk (UDP PR12 & SPD Planning for Risk) deviates from HSE's National Land Use Planning advice policies. This has the effect of uniquely subjecting populations of proposed developments in Halton to higher levels of Major Hazards (termed by Halton as CoMAH) risk when compared to populations found in the vicinity of Major Hazards Installations in all other locations in England, Scotland and Wales. To remedy this deficiency HSE requests Halton Borough Council gives primacy to HSE National Land Use Planning advice when considering the appropriateness of proposed development in the vicinity of Major Hazard Installations. Halton's Risk Policy(s) effectively sets aside HSE Land Use Planning PADHI+ National advice, contrary to the advice in DCLG Planning Practice Guidance Hazardous Substances which recommends that any advice from Health and Safety Executive that planning permission should be refused for development for, at or near to a hazardous installation or pipeline should not be overridden without the most careful consideration (see paragraph 071). Consequently, failure to give due weight to HSE Land Use Planning PADHI+ National advice by your Council may amount to de facto breach of Seveso II Directive I (Council Directive 96/82/EC as amended by Directive 2003/105/EC) Article 12: 'Member States shall ensure that their land-use and/or other relevant policies and the procedures for implementing those policies take account of the need, in the long term, to maintain appropriate distances between establishments covered by this Directive and residential areas, areas of public use and areas of particular natural sensitivity or interest, and, in the case of existing establishments, of	HSE concerns are noted, although it should be highlighted that these concerns were not raised during any of the consultations on the Core Strategy or the Planning for Risk SPD. Policy PR4: Major Accident Risks will seek to address the concerns raised by HSE in relation to the advice they provide.

Consultee	Consultee Comment (Summarised)	Council Response
	the need for additional technical measures in accordance with Article 5 so as not to increase the risks to people.'	
Michael Courcier Barton Willmore (on behalf of Junction Property and Caldwell) 01363/1/001 QUEST1	JPL agrees with the purposes of the Local Plan which are set out at paragraph 1.3 of the Scoping Report. It also agrees that the consultation report is a useful way of gathering public views about the scope of the D&ALP.	Comment noted.
Michael Courcier Barton Willmore (on behalf of Junction Property and Caldwell) 01363/1/002 QUEST2	The D&ALP needs to take full account of the National Planning Practice Guidance (PPG) which was issued in March 2014. In particular, the following guidance (ID 12-018-20140306) is of importance: "The plan should . . . be realistic about what can be achieved and when (in relation to infrastructure). This means paying careful attention to providing an adequate supply of land, identifying what infrastructure is required and how it can be funded and brought on-stream at the appropriate time; and ensuring that the requirements of the plan as a whole will not prejudice the viability of the development." This guidance will be of particular relevance to some candidate sites for potential exclusion from the Green Belt and allocation, which will have major infrastructure requirements and long lead-in times before the delivery of significant numbers of dwellings.	The Site Allocations will include an assessment of the Infrastructure required.
Michael Courcier Barton Willmore (on behalf of Junction Property and Caldwell) 01363/1/003 QUEST4	JPL considers that it is essential that the D&ALP is supported by an updated Strategic Housing Market Assessment (in terms of the numbers and types of dwellings required), an updated Strategic Housing Land Availability Assessment (in terms of housing supply) and an Economic Viability Assessment. All such documentation should be realistic in their assumptions. In line with previous representations, JPL considers that the Green Belt Study should be the subject of consultation before being approved as an evidence base document.	The Council does not intend to update its SHMA at this point, the SHLAA will be updated and the Green Belt Study will be subject to consultation.

Consultee	Consultee Comment (Summarised)	Council Response
Michael Courcier Barton Willmore (on behalf of Junction Property and Caldwell) 01363/1/004 QUEST6 to 10	JPL considers that the Core Strategy Spatial Vision remains relevant, but the strategic objectives should be made more relevant to the specific purposes of the D&ALP. In particular, there should be a strategic objective seeking the provision of significant numbers of higher value, lower density family houses in order to rebalance the housing offer of the Borough.	The Council considers that this is already covered by the objectives, which already looks to create balanced communities.
Michael Courcier Barton Willmore (on behalf of Junction Property and Caldwell) 01363/1/005 QUEST12 to 14	JPL agrees the general scope of Proposed Policies R1 to R6, in particular that R1 should allocate sufficient sites to deliver the Core Strategy housing requirement. JPL is concerned about the proposed scope of R2 and the implication that it would introduce local standards for new housing. National policy is that local plans should not contain such local standards which primarily are a matter for building regulations except where strict criteria are satisfied.	Policy R2 has now been reworked. In response to JPLs concerns it no longer includes local housing standards, and has instead been recreated as a policy on amenity more generally within development, rather than just for residential development.
Michael Courcier Barton Willmore (on behalf of Junction Property and Caldwell) 01363/1/006 QUEST 24 to 26	JPL welcomes the commitment for specific policies dealing with Green Belt releases and control of development in the Green Belt. JPL is however concerned that the document provides no information about the scope of Proposed Policy GB1. This is considered to be a major failing of the Scoping Document, and vitiates much of the purpose of consultation. JPL is concerned that the scope of Proposed Policy GB2 implies that the Council is considering significant variations to national Green Belt policy for Halton. Green Belt is a national policy and designation; and there should be very strong justification for any local variations to it. JPL welcomes the commitment to the identification of safeguarded land consistent with the Core Strategy.	Halton will ensure that the Green Belt policy remains in line with the national policy and that are local variations are justified.
Michael Courcier Barton Willmore (on behalf of Junction Property and Caldwell)	In line with our response to Questions 12 to 14, JPL considers that Proposed Policies SD1 and SD4 should not introduce local standards for new housing development on matters which are more properly	The Council will ensure that policies SD1 and SD4 do not introduce local standards for new housing development on matter that are more appropriately covered by Building Regulations.

Consultee	Consultee Comment (Summarised)	Council Response
Property and Caldwell) 01363/1/007 QUEST 30 to 32	covered by building regulations.	
Graham Trehwella Cass Associates 01365/1/001 QUEST 25	Introduction These representations are made on behalf of the Trustees of JW Allen who own and control land at the centre of Hale Village. The representations urge the Council to expand the scope of anticipated policy relating to the Green Belt. There is a demonstrable need to introduce specific guidance on development within the confines of Hale Village, the only inset village in the Green Belt in the Borough of Halton. Halton Core Strategy Local Plan The Core Strategy Local Plan (CSLP) confirms that Hale Village is inset in the Green Belt. Green Belt policy does not apply in the settlement boundary. Infill development in Hale Village is to be viewed as appropriate where it would enhance the character of the village. Green Belt Policies Policy CS6 of the CSLP mentions small scale development within the 'washed over' Green Belt settlements but it makes no mention of the single inset village in the Green Belt (Hale Village). This is an omission that can be addressed through the Delivery and Allocations Local Plan (DALP). There is a need for a specific policy relating to development principles in Hale Village. These principles will differ from those appropriate in 'washed over' Green Belt settlements. Hale Village is a sustainable rural community. The National Planning Policy Framework (NPPF) recognises that new housing has a role to	The Council will include policy in relation to Hale Village, to ensure that it is appropriately planned for.

Consultee	Consultee Comment (Summarised)	Council Response
	play in supporting the broader sustainability of villages and small settlements. Rural housing is seen as essential to supporting a thriving community and its facilities. It is important that policies in the DALP allow for some change in Hale Village to assist in its future vitality as a sustainable community. This change will include some limited development within the boundary of the inset village. We recognise that there will be a balance between meeting needs of new households, sustaining the village and its facilities and enhancing the particular characteristics of Hale Village. This balance can be addressed through an appropriately worded policy which relates to infill development or redevelopment at Hale Village. This is a policy that is needed and justified. It is also appropriate to consider moving a stage further in the DALP. There are opportunities at the centre of Hale Village for infill development which will bring much needed balance to the housing mix in the settlement. These opportunities should be identified in the DALP and allocated for housing. Site specific guidance could be given for each allocation so as to ensure that the right form of development is delivered and that any features of value are protected. This would represent positive planning and show support for this sustainable community. We propose an opportunity on a separate Call for Sites Form.	
Graham Trehwella Cass Associates 01365/1/002 QUEST 42	Site Allocations, Designations and Policies Map: Following on from the representations we have made on Green Belt Policies set out in the Scoping Document we propose land to be allocated for a mix of housing and greenspace at the heart of Hale Village. Accordingly, we have completed Appendix H: Call for Sites Form and submitted this separately.	Comment noted.
Fiona Pudge Sport England 01366/1/001	Sport England Strategy 2012-2017: Creating a Sporting habit for Life Economic Importance of Sport in the North West (2010)	Comment noted.

Consultee	Consultee Comment (Summarised)	Council Response
QUEST 2	Sport England's strategy refers to Sport England's statutory planning remit which must be taken into consideration. The economy site allocations and policies may benefit from reference to the economic benefits of sport.	
Fiona Pudge Sport England 01366/1/002 QUEST 3	No. In terms of meeting paragraph 73 of NPPF only aware of the emerging Playing Pitch Strategy. Sport England is not aware of any robust and up to date assessment of needs and opportunities for other forms of outdoor sport or indoor sport. Requirement to identify needs and opportunities for sport and recreation in line with paragraph 73 of NPPF.	The Council has recently undertaken a PPS utilising the (then) emerging Sports England Guidance. This has informed an action plan looking 3-5 years ahead. Additional work will need to be undertaken to look across the longer time horizon to 2028 and beyond possibly in the form of a Sports Assessment (as per Sports England guide) The Council will be reviewing Open Space provision across the borough taking account of latest demographic figures. The Council will be commissioning an update of the Retail and Leisure Study. Consideration is being given as to whether this study should encompass commercial leisure.
Fiona Pudge Sport England 01366/1/003 QUEST 4	The Council are preparing a Playing Pitch Strategy which should be complete by June 2014. However, Sport England is not aware of an Indoor Sports Facility Strategy or any other related strategies that identify needs and opportunities for sport and recreation in line with paragraph 73 of NPPF. Requirement to identify needs and opportunities for sport and recreation in line with paragraph 73 of NPPF.	Comment noted. The Council will consider the need to undertake a Sports Assessment (as per the Sports England guidance).
Fiona Pudge Sport England 01366/1/004 QUEST 7	The current and planned cuts will have an impact on existing and planned sports provision. However, there will be an increase in demand arising from the proposed housing over the plan period. There will be tough decisions to be made that the assessment of needs and opportunities can provide evidence, justification and potential solutions to help resolve (to accord with para 73 of NPPF).	Comments noted. Provision of additional housing in itself does not guarantee an increase in the Borough's population and certainly not in the age ranges most likely to take part in active sports. The Council will consider the latest demographic forecasts to the end of the plan period to assess the need for various supporting infrastructure, including formal sports provision.

Consultee	Consultee Comment (Summarised)	Council Response
Fiona Pudge Sport England 01366/1/005 QUEST 9	There is no recognition of the role of sport and recreation in the delivery of the health and wellbeing agenda or the economic/social value of sport within local communities.	Comment noted. The provision for Sport and active leisure / travel crosses a number of themes and is reflected across a number of Strategic Objectives, namely 6, 7, 9, 10 and particularly 11.
Fiona Pudge Sport England 01366/1/006 QUEST 11	Sport and recreation has a specific role and function and falls between the Green Infrastructure and Health Well Being objectives. Sport England would welcome a separate strategic objective that recognises the role and value of sport and recreation in contributing to health and wellbeing and the economy.	Comment noted. The provision for Sport and active leisure / travel crosses a number of themes and is reflected across a number of Strategic Objectives, namely 6, 7, 9, 10 and particularly 11. The Council considers this is adequate and mirrors the cross cutting nature / benefits of active leisure/travel.
Fiona Pudge Sport England 01366/1/007 QUEST 13	Policy R5 - The open space standards in the SPD are not appropriate for pitch sports. The Council's Playing Pitch Strategy (PPS) provides a site specific action plan which should be used to inform pitch sport provision associated with housing development. Paragraph 73 of NPPF no longer refers to the need to develop local standards. In the majority of cases on site pitch provision is not viable or sustainable. Developer contributions should be linked to the PPS Action Plan. Sport England has just published guidance on Assessing Needs and Opportunities for sports facilities which replaces the sport and recreation element of the now defunct PPG17 Companion Guide.	The Council has recently undertaken a PPS utilising the (then) emerging Sports England Guidance. This has informed an action plan looking 3-5 years ahead. Additional work will need to be undertaken to look across the longer time horizon to 2028 and beyond. This will necessitate the use of general assumptions and may require a different approach to Sport England's (short term) methodology as the players of tomorrow have not been born yet. Policy NH6 deals with the requirement to plan for Open Space and Outdoor Sports provision over the longer term.
Fiona Pudge Sport England 01366/1/008 QUEST 19	Policy TC4 (Community Facilities) - the loss of any community facility (if related to open space, sport and recreation) should be clearly demonstrated to be surplus to requirement in accordance with paragraph 74 of NPPF. This should be identified by an up to date and robust assessment of needs and opportunities.	There is potential for overlap between TC4, HN6 and a lesser extend R6. This overlap / ambiguity will be addressed in the policy drafting.
Fiona Pudge Sport England 01366/1/009 QUEST 34	Policy NH6 - The open space standards are not appropriate for pitch sports. The Council's Playing Pitch Strategy (PPS) provides a site specific action plan which should be used to inform pitch sport provision associated with housing development. Paragraph 73 of NPPF no longer refers to the need to develop local standards. In the majority of cases on site pitch provision is not viable or sustainable. Developer contributions should be linked to the PPS Action Plan. Sport England has just published guidance on Assessing Needs and	Comment noted. NPPF requires the Council to plan positively for social, recreational and cultural facilities. Whilst there is no specific mention of local standards, policies will need to be based on a proportionate assessment of need and will need to provide certainty to both developers and the local community. Whilst the PPS has been prepared and the Council is committed to

Consultee	Consultee Comment (Summarised)	Council Response
	Opportunities for sports facilities which replaces the sport and recreation element of the now defunct PPG17 Companion Guide. Open space, sport and recreation provision should protect, enhance or provide new as identified in an up to date and robust needs assessment. This is to accord with paragraph 73 and 74 of NPPF.	keeping the information up to date, it does not extend to the time horizons necessary for the Delivery and Allocations Local Plan.
Fiona Pudge Sport England 01366/1/010 QUEST 47	There may be playing field allocations required as a consequence of the findings of the emerging Playing Pitch Strategy.	Comment accepted. There may be a need to allocate land for playing pitches or other open space as part of the DALP to ensure adequate provision.
Fiona Pudge Sport England 01366/1/011 QUEST 48	There are no policies relating to indoor sports provision either to protect existing or provide new/enhanced. New provision may be required as a result of an increase in demand arising from new housing development. However, Sport England is not aware of a needs assessment for indoor sports facilities in accordance with paragraph 73 of NPPF.	Comments noted. Provision of additional housing in itself does not guarantee an increase in the Borough's population and certainly not in the age ranges most likely to take part in active sports. The Council will consider the latest demographic forecasts to the end of the plan period to assess the need for various supporting infrastructure, including formal sports provision.
Nathan Renison Halton Borough Council 01367/1/001 ALL	Thank you for providing Economy, Enterprise & Property Dept. (EEPD) with the opportunity to comment upon the Delivery and Allocations Scoping Document. This is an important stage in the plan-making process for Halton as it moves to setting out the policies and allocating the land uses that will realise the spatial vision within the Council's Core Strategy. The EEPD brings together a number of functions of the Council that will be influenced by the policies of Local Plan (Operational Property Services); have an enabling and delivery role for some Allocations (Development and Investment Services); and, help realise the wider local economic and social benefits for residents and businesses (Employment, Learning and Skills Services). EEPD recognises the importance of the Core Strategy and a number of the service area have been designed and structured to direct Council resources and expertise to contribute to implementation of each Key Area Change and to maximise local benefits from them. Notably this is through the work of the following Teams - External Funding, Business Growth &	Noted

Consultee	Consultee Comment (Summarised)	Council Response
	Investment, Regeneration and the Halton Employment Partnership. On the basis of the above, EEPD provide the following comments:	
Nathan Renison Halton Borough Council 01367/1/002 QUEST Question 1	We agree with the purpose of the Scoping Document.	Noted.
Nathan Renison Halton Borough Council 01367/1/003 QUEST Q2	Alongside the plan making process the Council is currently developing its (Strategic) Regeneration Framework and Delivery Plan. This document will acknowledge that strategic context has already been well defined. Therefore it will be focussed on a long-term strategy for delivering Halton's regeneration priorities to maximise benefits for local businesses and residents, particularly those within areas of greatest need.	Comment noted. Where appropriate, the Regeneration Framework and Delivery Plan will be considered in the preparation of the Delivery and Allocations Local Plan.
Nathan Renison Halton Borough Council 01367/1/004 QUEST Q3	We agree the supporting documents are appropriate. Specifically we are encouraged that the Equality and Impact Assessment will include assessing "promoting equality of access and opportunities for all communities" (para 3.8). This is particularly important in regards utilising the Local Plan to contribute to tackling inequalities within our areas of highest deprivation through raising skills and reducing unemployment.	Noted.
Nathan Renison Halton Borough Council 01367/1/005 QUEST Q4	In respect of the proposed evidence base we are pleased to see the inclusion of a 'Borough Development Viability Study'. This will need to take account of different land values throughout the Borough and also the some of the unique challenges present within Halton due to our legacy of contaminated land. As such there is not a level playing field for delivery within Halton, for instance between greenfield residential development within North Widnes compared to brownfield development within the South Widnes Key Area of Change. It would be beneficial if any viability study explored the 'viability gap' between different localities within the Borough and possible mechanisms for closing any gaps.	Comment noted. Will take into consideration the 'viability gap' between different localities within the Borough and the possible mechanism for closing any gaps within the Borough Development Viability Study.

Consultee	Consultee Comment (Summarised)	Council Response
Nathan Renison Halton Borough Council 01367/1/006 QUEST	Additionally we would support a review of the 2009 Halton Retail and Leisure to take account of any potential capacity changes as a result of recent developments and commitments that have come forward.	Support noted.
Nathan Renison Halton Borough Council 01367/1/007 QUEST Q5	We are comfortable with the proposed timetable.	Noted.
Nathan Renison Halton Borough Council 01367/1/008 QUEST Q6-11	We support the Spatial Vision and Objectives	Noted.
Nathan Renison Halton Borough Council 01367/1/009 SECT Policy R1	Policy R1 - It is important that site selection reflects the locational priorities of the Core Strategy and the focus on the Key Areas of Change. The site selection process is therefore critical, which whilst grounded in viability must also focus on the wider benefit for the Borough as whole from delivery of the Key Areas of Change. Particularly residential development pressure may come from the 'low hanging fruit' of greenfield sites outside of the Key Areas of change, and whilst this will help meet our quantitative requirements it may have a detrimental effect on delivery of our overall spatial vision. The Core Strategy provides a land use management framework that previous Halton Development Plans have successfully employed to bring forward a mix of greenfield sites alongside more difficult brownfield urban renewal sites.	Comments noted. The allocation of residential development will follow the policy framework set out within the Core Strategy. The Key Areas of Change represent 'the initial focus for new development and are where the biggest transformation of the Borough's landscape is expected to occur'. It should be noted that CS1: Halton's Spatial Strategy states that 'the housing land supply position indicates that a partial review of Green Belt boundaries to serve the development needs of Widnes and Hale will be required in the early part of the plan period'. This partial Green Belt Review is ongoing in parallel to the preparation of the Delivery and Allocations Local Plan and will be used to ensure that there is a sufficient ongoing supply of deliverable development land to meet the housing requirements of the Borough.
Nathan Renison Halton Borough Council 01367/1/010 QUEST Policy R4	Policy R4 - Taking into account that this document will delete UDP policy RG6: Castlefields and Norton Priory Action Area, it is important that provision is made for investment and change within existing residential areas, but in particular those outside of Key Areas of Change which could benefit from their relationship to these Areas. An example of these are former new town neighbourhoods i.e.	The Council will amend Policy R4 to include reference to Primarily Residential Areas. It should be noted that Policy R4 has been amended to become a general amenity policy, however, it still retains a reference to Primarily Residential Areas. Primarily Residential Areas are also referenced in the R1: Residential

Consultee	Consultee Comment (Summarised)	Council Response
	Murdishaw, Castlefields and Windmill, where there is the potential to capture some the wider benefits associated with the expansion of East Runcorn Key Area of change to help improve the housing offer, quality and perceptions of these neighbourhoods. Whilst such neighbourhood regeneration is unlikely to be on the scale of previous New Town interventions (as acknowledged in para 6.2 of the Core Strategy), this approach would tap into the strong existing partnership work adopted since 1989 between the Council and the Registered Providers represented in the former new town. Additionally it could help stimulate growth through making infill development more attractive in some neighbourhoods in line with emerging government policy set out in the Autumn Statement (para 1.234) and help meet brownfield housing targets. Policy R4 may also benefit from being framed within the context of designated 'Primarily Residential Areas'.	Allocations. The Council will also make greater reference to regeneration and renewal within Policy R1: Residential Allocations, to support any future opportunities that arise in these areas.
Nathan Renison Halton Borough Council 0136711011 QUEST Economy	Policy E1 represents an opportunity to build upon para 7.1 and 7.9 of the Core Strategy and paint a stronger portrait of the role and function of Halton's Employment Areas. This approach would enable associated policies E2 and E3 to be focussed on stimulating vibrant business communities. For instance Policy E2 could be used to recognise the opportunity for incoming businesses to be absorbed within existing top-tier COMAH at Rocksavage (INEOS Chlor) and benefit for existing Infrastructure and expertise within that Employment Area and stimulate agglomeration. Similarly policy E3 could distinguish a more flexible approach within some Local Employment Areas such as The Heath and Sci-Tech Daresbury, where complementary uses such as health and educational institutions and informal places to meet help foster collaboration whilst not detracting from the primary employment use. This approach would provide a stronger rational for site selection in accordance with Core Strategy Policy CS4 and in particular identifying site to deliver the 130.55ha (Table 3 Core Strategy) of regeneration and remodelling opportunities. A further example of a local employment area which could benefit from a role and function	

Consultee	Consultee Comment (Summarised)	Council Response
	approach is Astmoor Industrial Area. This is due to a number of characteristics including its relationship to the Mersey Gateway Project, an engaged business community, underutilised interface with Runcorn Old Town / Wigg Island and some aging and out-dated premises; could bring forward significant 'recycled sites' through remodelling over the plan period.	
Nathan Renison Halton Borough Council 01367/1/012 QUEST Policy TC2	Policy TC2 - Town Centre Health Checks will be a useful tool in helping to define and protect primary and secondary retail frontage and associated policy matters.	Comment noted.
Nathan Renison Halton Borough Council 01367/1/013 QUEST Policy TC5 (Tourism Attractions)	Policy TC5 (Tourism attractions) - Would also sit well alongside economic policies as a 'Visitor Economy' policy with the links to Halton benefiting from growth in this sector within the Liverpool City Region. This is a priority for the Liverpool City Region LEP: http://liverpoollep.org/priorities/visitor_economy.aspx .	Comments noted. This will be considered in the drafting of policies within the Delivery and Allocations Local Plan
Nathan Renison Halton Borough Council 01367/1/014 QUEST Key Areas of Change	Bringing forward masterplans and delivery strategies for each Key Area of Change will vary between respective Key Areas where project and programmes are at different stages of feasibility, development and delivery. Programmes at 3MG and Widnes Waterfront (within South Widnes Key Area) are well established and actively being delivered; Sci -Tech Daresbury is moving forward as a series of phases and from feasibility to development and delivery of projects; whilst West Runcorn and West Bank (within South Widnes) are still at feasibility stage with no masterplan developed and deliver vehicle still being determined. As such a rigid policy may not be appropriate in all circumstances with greater flexibility in terms of allocation within these areas.	Comments noted. Agree that flexibility should be a component of the Key Area of Change policies, particularly in areas where development and regeneration opportunities may change during the lifetime of the plan.
Nathan Renison Halton Borough Council 01367/1/015 QUEST Key Areas of	There is also the need to progress policy Core Strategy Policy CS16 - The Mersey Gateway Project and particularly delinking of SJB (para 19.6, Core Strategy); although as acknowledged within the Infrastructure Plan, further work is required to determine the shape of de-linking. It is only after this exercise that potential to open up	The possible future de-linking of the Silver Jubilee Bridge in Runcorn will be considered in the drafting of the West Runcorn Key Area of Change policy (KA3). Agree that further work is necessary to determine what opportunities are available.

Consultee	Consultee Comment (Summarised)	Council Response
Change	land for development in South Widnes and West Runcorn can be assessed.	
Nathan Renison Halton Borough Council 01367/1/016 QUESTQ 24 - 26	No comments to make.	Noted.
Nathan Renison Halton Borough Council 01367/1/017 QUEST Policy C2	Policy C2 - Consider specific reference to facilitating creation of 'Mid Mersey Loop' utilising existing TPT / Sankey Canal and Bridgewater Way to create a circular leisure route crossing a (redefined) SJB and (in Warrington) via Arpley crossing of the Mersey at Forrest Way. This could link into policy NH5 and connectivity of largely waterfront and green assets at Wigg Island, Runcorn Promenade, Spike Island, Sankey Valley, Moore Nature Reserve and Runcorn Town Park. Possible linkage into the work of the Mersey Gateway Environmental Trust and a requirement for joint working with Warrington BC.	
Nathan Renison Halton Borough Council 01367/1/018 QUEST Policy C3	Policy C3 - Would benefit from specific reference to rail and water freight / logistics and points where these interface and connect.	Comment noted.
Nathan Renison Halton Borough Council 01367/1/019 QUEST Policy C7	Policy C7 - Policy or its justification could benefit from establishing principle of potential need for mitigation i.e. through the relationship to delivery of Mersey Forest.	
Nathan Renison Halton Borough Council 01367/1/020 QUEST Sustainable Design Policy SD2	Policy SD2 - Considering moving shop front design policy to TC chapter and establishing principle of producing a Local Development Order to negate need for shop front planning permission in certain areas (i.e. Runcorn Old Town) to help stimulate development.	The Shop Fronts Policy will be moved to the Town, District and Local Centres Policies. Consideration will be given to the potential for a Local Development Order covering shop front planning permissions in certain areas.
Nathan Renison	Policy SD4 - Within the justification acknowledge abundance of hard	The Council will acknowledge the concerns raised in the comments

Consultee	Consultee Comment (Summarised)	Council Response
Halton Borough Council 01367/1/021 QUEST Sustainable Design Policy SD4	to treat properties for energy conservation within Halton, particularly within former new town due to construction methods. Principles of approach that HBC will seek are 'whole row' and neighbourhood wide interventions to secure wider benefits from measures such as external wall insulation which may require planning permission.	within the justification text for this policy. It should be noted that Policy SD4 is now SD5.
Nathan Renison Halton Borough Council 01367/1/022 QUEST Natural Historic Env - Policy NH3	Policy NH3 - Establish principle that development should improve public access to Halton's Waterfront and connections to waterfront location and acknowledge the wider economic value of our waterfront assets. Consider specific reference to work the Mersey Gateway Environmental Trust over the plan period.	Agree that development should improve public access to Halton's waterfronts and connections to waterfront locations. Also agree that the wider economic value of waterfront assets is considered, particular in the policy justification. These matters will be referred to in the draft policy. Reference to the Mersey Gateway Environmental Trust will also be considered in policy drafting.
Nathan Renison Halton Borough Council 01367/1/023 QUEST Natural Historic Env	Whether it's here or elsewhere it may be prudent to protect ship boat yards and dry docks along our waterways as they contribute to the waterway economy and its vitality and viability. This is particularly important as a number of our waterways are not through routes.	
Nathan Renison Halton Borough Council 01367/1/024 QUEST Natural Historic Env - Policy NH6	Policy NH6 - Can policy establish where appropriate a principle of quality rather just quantity will be employed.	The policy will require any lost open space to be replaced with open space of both a similar quality and quantity.
Nathan Renison Halton Borough Council 01367/1/025 QUEST Pollution Risk	No comments to make.	Noted.
Nathan Renison Halton Borough Council 01367/1/026 QUEST Minerals	No comments to make.	Noted.

Consultee	Consultee Comment (Summarised)	Council Response
Nathan Renison Halton Borough Council 01367/1/027 QUEST Site Allocations - Appendix G: Assessment Form	Assessment Form (appendix G) Within summary section highlight delivery support / Council enabling role requirements - i.e. will gap funding, advance works or partnership working be required to help bring site forward. Within Designations 'Key Area of Change' allow for 2nd tier to acknowledge if a site is adjoining or within sphere of influence of a Key Area Change. Within 'proposal' assess potential of a site to deliver social value benefits.	The Council will seek to include more information within the form that highlights: - the support or enabling role that may be required from the Council in bringing a site forward (eg. Gap funding). - if a site is within the sphere of influence of an 'Area of Change'. The Site Assessment form will already allow for benefits to be considered.
Nathan Renison Halton Borough Council 01367/1/028 QUEST Designations	Uses which may benefit from designation are - primarily residential areas and community facilities (social infrastructure) where this doesn't form part of wider protection - i.e. local centre. Of particular importance is the need to suitably designate the site of Halton Hospital, which will be undesignated following deletion of UDP policy S22 (unallocated land), no suitable policy designation as set out the list of proposed designations (para 8.7 p35). Health is a major challenge facing Halton, and a corporate priority and as such the site should be safeguarded as a 'Health and Wellbeing campus' with development only permitted which contributes to this purpose.	Primarily residential areas are to be retained and will now be included within the list of designations. Further consideration will be given to how best to plan for the hospital campus, and other health facilities across the Borough.
Nathan Renison Halton Borough Council 01367/1/029 QUEST	In respect of deletions loss of UDP policy RG6 needs to be replaced with a suitable hook (as identified within response to question 12 - 14 above) as housing renewal (outside of Key Areas Of Change) will continue to play a role within place-shaping Halton. Loss of UDP policy H4 (sheltered housing) needs to be replaced by acknowledging within justification of policy R4 and prioritise location within or close to town and district centres.	The Council will include some wording within the residential policies that allows for regeneration and housing renewal to occur where appropriate. The Council will include an additional policy in relation to older people's and specialist housing needs.
Nathan Renison Halton Borough Council	(Informal Comment - in Verb section) To inform both production of the delivery and allocations document and the regeneration strategy a joint Dept. priority is the production	

Consultee	Consultee Comment (Summarised)	Council Response
01367/1/030 ALL Informal Comments	of the 'SJB Delinking Strategy' to assess options and scenarios for delinking, including assessing: financial viability; implications for existing utilities and service connection; contribution to not prejudicing the reopening the Runcorn Locks; contribution to meeting the objectives of the Mersey Gateway Sustainable Transport Strategy and realising the respective visions for South Widnes and West Runcorn Key Areas of Change. It is acknowledge that some initial work has been undertaken and Members Working Group established to assess this, now might be the time to reconstitute this group.	
Nathan Renison Halton Borough Council 01367/1/031 ALL Informal Comments	(Informal Comment - in Verb section) The process for assessing sites within (and adjoining) Key Areas of Change would benefit from a buddy system between Planning and Regeneration. Regeneration Officers would be allocated on basis of Key Areas of Change via Sally McDonald (3MG, East Runcorn) and Sara Munikwa (South Widnes and West Runcorn). Where appropriate Asset Management could also be involved.	The Council will continue to work with other departments within the Council including Regeneration in the process of preparing the DALP.
Nathan Renison Halton Borough Council 01367/1/032 ALL Informal Comments	(Informal Comment - in Verb section) It may be useful to hold a internal stakeholder session involving property services, open spaces, school place planning and regeneration to help identify sites to go into the 'call for sites'. A similar stakeholder session could be held where assessing which sites make the cuts and were HBC enabling role may be called upon.	
Duncan McCorquodale Cheshire West and Chester Council S003/2/001 QUESTI	In general terms, we support the approach to the suggested policies set out in the Scoping Document. We have worked jointly with Halton and other neighbouring authorities on the development of the latest evidence base regarding the Gypsy, Traveller and Travelling Showpeople Accommodation Assessment. Moreover, we have set out the latest position on the duty to cooperate in so far as it relates to Cheshire West and Chester, and Halton. This is contained in our duty to cooperate statement that accompanied the submitted Cheshire West and Chester Local Plan (Part One) Strategic Policies (December 2013).	Comment noted.
Duncan McCorquodale	In general terms, we support the approach to the suggested policies	Comment noted.

Consultee	Consultee Comment (Summarised)	Council Response
Cheshire West and Chester Council S003/2/002 QUEST12	set out in the Scoping Document. We have worked jointly with Halton and other neighbouring authorities on the development of the latest evidence base regarding the Gypsy, Traveller and Travelling Showpeople Accommodation Assessment. Moreover, we have set out the latest position on the duty to cooperate in so far as it relates to Cheshire West and Chester, and Halton. This is contained in our duty to cooperate statement that accompanied the submitted Cheshire West and Chester Local Plan (Part One) Strategic Policies (December 2013).	
Mr Jonathan Clarke Knowsley Metropolitan Borough Council S004/4/001 ALL	I am writing in response to consultation on the Delivery and Allocations Local Plan (DALP) for Halton. Thank you for consulting Knowsley Council on this matter. As you will recall, Knowsley Council was consulted at various stages of preparation of the Halton Core Strategy, which is now adopted. We have previously raised with yourselves the issue of proposed Green Belt review and release in the Widnes/Hale area of Halton, and the need to ensure that any resultant impacts on Knowsley's communities are addressed, both in terms of cross-boundary issues and of shared housing market areas. Having reviewed the consultation documents recently published, including the proposed scope of the DALP for Halton, this issue remains our central area of interest. We look forward to the publication of the Widnes and Hale Green Belt Study for consultation later this year, and will seek opportunities to engage with you regarding the preparation of this Study as appropriate. This will enable discussion between the authorities, to ensure that any adverse impacts on Knowsley's communities can be identified and addressed at an early stage. In the spirit of ongoing cooperation between our authorities, I would be most grateful if you would continue to fully involve Knowsley Council in the preparation of the Halton Local Plan and its evidence base. To confirm, we would request that you continue to include Knowsley Council (contacts Sheena Ramsey and Jonathan Clarke) in	Halton will continue to fully involve Knowsley Council in the preparation of the Halton Local Plan and its evidence base. The Council will continue to work with Knowsley in relation to cross boundary issues including those in relation to housing and the Green Belt as part of the Duty to Cooperate.

Consultee	Consultee Comment (Summarised)	Council Response
	your Local Plan consultation database.	
Ms Angela Atkinson Marine Management Organisation S077/1/001 ALL DALP	The MMO has reviewed the document and whilst we have no specific comments to make we would like to draw your attention to the remit of our organisation as you may wish to be aware of this in relation to the consultation.	Comment noted.
Ms Julie Egan Halebank Parish Council S082/1/001 QUEST 1	We would argue (see summary below) that the DALP scoping document is not fit for purpose given the reasons we outline. Firstly the document, like all the Local Plan consultation processes is presented in a difficult and overly technical way. It's not easy for consultees or stakeholders to respond creatively to the proposals or engage with their underlying assumptions.	This comment is noted. The Local Plan is a statutory document and as such often has to be written a very particular format and use specific terminology that is accepted in planning case law. Further efforts will be made during the next stage of consultation to make it easier for consultees to respond creatively.
Ms Julie Egan Halebank Parish Council S082/1/002 QUEST 2	Other neighbouring councils policies & plans regarding rail freight - St Helens Council Local Development Framework - Parkside. The re-emergence of Parkside would provide the region with rail freight terminal that has direct rail connectivity to the Port of Liverpool unlike Ditton.	Halton is working closely with neighbouring authorities as part of the duty to cooperate and will continue to do so throughout the preparation of the Local Plan. Cross boundary issues such as rail freight will be considered as part of this duty. The recent Super Port Study has identified a significant shortage of warehousing and rail served distribution facilities within the wider region and acknowledges the important contribution of 3MG to the sub-region. An amendment will be made to this section of the document to make reference to the neighbouring authorities' plans and policies and those of the wider Liverpool City Region.
Ms Julie Egan Halebank Parish Council S082/1/003 QUEST 6	Yes, but not being addressed properly - particularly with regards to attracting skilled workers to the Borough, protecting the Borough's green infrastructure network, utilising resources (land as a 'resource' in this context) sustainably and reducing congestion. Approving a planning application for HBC Fields land removed from the greenbelt to create 'employment' to site a logistics shed which would employ low skilled forklift truck drivers and packing assistants -	This comment is noted. It should be noted that logistics is considered to be an appropriate use for an employment site and that logistics uses are identified as an area to be developed in Halton. The Council will continue to work to address the challenges identified including attracting skilled workers, protecting the Borough's GI Network, utilising resources and reducing congestion.

Consultee	Consultee Comment (Summarised)	Council Response
	does not meet any of these challenges and contradicts all of them.	
Ms Julie Egan Halebank Parish Council S082/1/004 QUEST 8	Yes it does, but in reality it is not being followed particularly with regards to creating & supporting attractive, accessible and adaptable residential neighbourhoods where people would want to live. The Sunningdale Park development in Hale Bank is adjacent to industrial sites & brownfield sites. There has been an on-going issue with the failure of HBC to regulate the industrial neighbours effectively who consistently cause noise & air pollution. This is not an adaptable or attractive place to live. It is accessible dependant on HGV parking and movements to the adjacent industrial premises. A complete failure of this 'spatial vision'. Furthermore should Site 253 ever be developed in Hale Bank Road as a logistics distribution centre this will create a similar situation as the one in Sunningdale Park for residents already in situ.	It is proposed that the Delivery and Allocations Local Plan will share the same Vision as the Core Strategy.
Ms Julie Egan Halebank Parish Council S082/1/005 QUEST 9	No, actually item number 1 in 6.14 should probably be removed because it is impossible to have this vision and operate in the way HBC actually does. It is a false, meaningless aspiration.	Creating and supporting attractive, accessible and adaptable residential neighbourhoods where people want to live is still felt to be an appropriate Objective for both the Delivery and Allocations Local Plan and the Core Strategy.
Ms Julie Egan Halebank Parish Council S082/1/006 QUEST 10	Hale Bank Parish Council is deeply concerned about a range of issues relating to sustainable development, improving the quality and amenity of neighbourhoods and building a flourishing and rewarding economy.	This comment is noted. The Council will continue to work to address the challenges identified and to achieve the Visions and Objectives of the Core Strategy and Delivery and Allocations Local Plan.
Ms Julie Egan Halebank Parish Council S082/1/007 QUEST 15	No. The emphasis on logistics and distribution directly applies to the future allocation of key sites within our community namely the proposed employment site in Hale Bank Lovel Fields (or HBC Fields) allocated for the expansion of the 3MG development. Hale Bank PC seriously questions whether this allocation is compatible with the core vision and objectives set out in this document in that this kind of development does little to diversify the local economy, support the creation of higher value employment,	The Scoping Document does not allocate sites, although future iterations of this document will. Consideration will be given to all existing allocations, to ensure that these remain the most appropriate sites for development.

Consultee	Consultee Comment (Summarised)	Council Response
	improve the quality of our residential neighbourhood or promote sustainability.	
Ms Julie Egan Halebank Parish Council S082/1/008 QUEST 16	Site 253/HBC Fields/Lovel Fields allocation should at this stage be revised to give a broader and more aspirational assessment of its potential.	Consideration will be given to all existing allocations, to ensure that these remain the most appropriate sites for development and to consider the principles for development.
Ms Julie Egan Halebank Parish Council S082/1/009 QUEST21	Difficult to comment on Policy No 15 KAI 3MG without reading site specific policies or seeing illustrative layout.	This is currently only the Scoping Document for the Delivery and Allocations Local Plan and the key elements and general principles for development have already been set out in the Core Strategy therefore it was not felt appropriate to provide any more detail. However, further details about the development of this site will be provided in the next stage of the preparation of the Delivery and Allocations Local Plan.
Ms Julie Egan Halebank Parish Council S082/1/010 QUEST 23	More information needed. Impossible to comment.	This is currently only the Scoping Document for the Delivery and Allocations Local Plan and the key elements and general principles for development have already been set out in the Core Strategy therefore it was not felt appropriate to provide any more detail, other than to set out how this area of policy will be dealt with ie through site specific policy and an illustrative layout. Further details about the development of this site will be provided in the next stage of the preparation of the Delivery and Allocations Local Plan.
Ms Julie Egan Halebank Parish Council S082/1/011 QUEST 29	Policies C6 & C7 should be either deleted or re-written given the fall in air traffic using LJLA & the withdrawal by airlines of many routes.	Halton Borough Council continues to work with Liverpool John Lennon Airport to ensure that the policy within the Halton Local Plan is appropriate. Although it is agreed that passenger numbers have not increased in the amount expected, this does not remove the need to plan for a future where the Airport has the opportunity to expand and grow.
Ms Julie Egan Halebank Parish Council	Much more rigorous enforcement action needed by HBC for those who pollute by either air/noise in Borough, for existing development. New developments which have potential to pollute or cause nuisance	The Council will continue to consider each planning application on its merits in relation to the planning policy that is applicable at the time. The Local Planning Authority will continue to work other teams

Consultee	Consultee Comment (Summarised)	Council Response
S082/1/012 QUEST 37	should be refused. Incorporating mitigation measures does not always work. The twin communities of Widnes and Runcorn have endured sufficient pollution in past. It should be the duty of a responsible, environmentally aware Borough Council to refuse any additional likely polluters.	within the Council such as Environmental Health and external to the Council such as the Environment Agency to ensure that developments are mitigated for and monitored as appropriate.
Ms Julie Egan Halebank Parish Council S082/1/013 QUEST 42	Site 253/Lovel Fields/ HBC Fields should be considered for alternate use given the total unsuitability of its present designation. It is unsuitable in its present form to either the wider regional economy or the local environment. It is in the wrong location for its present designation and the site could deliver a much greater economic benefit for the Borough and provide a more positive environmental impact were it to be re-allocated for a different less polluting use.	Consideration will be given to all existing allocations, to ensure that these remain the most appropriate sites for development and to consider the principles for development.

Appendix B: Scope of the Delivery and Allocations Local Plan (2016)

Consultation Comments

Consultee	Consultee Comment (Summarised)	Council Response
00083 Mr Raymond J Liptrot 00083/2/001 QUEST 13.2 Site Allocations	Demolish the derelict Court House which has been in a state of disrepair and an eyesore for many years, and could provide suitable space for development in the Local Plan. The space provided by their removal could be used to erect an apartment block for Syrian refugees, or Widnes families awaiting accommodation.	The former courts have been demolished. The Council will determine any applications for development on this site on their merits. The Proposed Policies Map sets out the potential allocations and designations for the Borough.
00083 Mr Raymond J Liptrot 00083/2/002 QUEST 13.2 Site Allocations	Demolish the old Police Building which is also in a bad state and is also an eyesore, and could provide suitable space for development in the Local Plan. The space provided by their removal could be used to erect an apartment block for Syrian refugees, or Widnes families awaiting accommodation. I wish to put forward for your consideration some proposals about providing suitable space to include in the plan.	The Old Police Building has been demolished. The Council will determine any applications for development on this site on their merits. The Proposed Policies Map sets out the potential allocations and designations for the Borough.
00083 Mr Raymond J Liptrot 00083/2/003 CHAP 13 Site Allocations	I believe there is no available space remaining in North Widnes to provide more housing estates; it is becoming cluttered with urban spread, including traffic with the subsequent pollution and noise.	All sites submitted for development will be considered through the Site Assessment process, this will include consultation with our Highways and Environmental Health colleagues before any sites are allocated.

00083 Mr Raymond J Liptrot 00083/2/004 CHAP 13 Site Allocations	Have we used all the Brownfield Sites?	The Strategic Housing Land Availability Assessment (known as the SHLAA) sets out the potential availability of land for housing in the Borough, this also identifies whether the sites are brownfield or not, this document is available on the Council website (www.halton.gov.uk). Further information in relation to the need for development in North Widnes is provided in the Green Belt Briefing Note, which can be found at http://www3.halton.gov.uk/Pages/planning/policyguidance/pdf/evidencebase/halegreenbelt/BriefingNoteGreenBeltReview.pdf
00371 Mr R Greenway Robin Greenway & Co (on behalf of Hale Estates) 00371/2/001 QUEST 13.2 Site Allocations	It is suggested that the existing village Green Belt inset boundary be reconfigured to create a more sensible settlement edge, such that it more realistically follows the built form of the village, save where existing development is limited to one side of the road. This reconfiguration will release a limited number of small infill sites accommodating one or two individual units. However, and specifically, our proposals would create two modest potential development sites, namely Home Farm farmstead/Hale Garage and Manor Farm farmstead. None of the infill or development sites created as a consequence of the above conform with the purposes of inclusion within the Green Belt and make no contribution to the purposes of inclusion.	The Green Belt boundary for Hale will be considered as part of the ongoing Widnes and Hale Green Belt Study. Where considered appropriate as part of the Green Belt Study or for non-Green Belt sites, sites that have been submitted for development have been considered through the Site Assessment process. Proposed sites to be released from the Green Belt are set out in Policy GB TEMP: Green Belt Release Allocations, as well as within other appropriate allocation policies (e.g. Policy ED1: Employment Allocations and RDI: Residential Development Allocations), and can be located on the proposed Policies Map.

00371 Mr R Greenway Robin Greenway & Co (on behalf of Hale Estates) 00371/2/002 QUEST 13.2 Site Allocations	Edge of Settlement Sites We would advocate the allocation of additional land for residential development on the eastern edge of the village to meet the identified housing need requirements over the current Plan period. These parcels would be excluded from the Green Belt. It is not considered that this land makes any genuine contribution toward its inclusion within the Green Belt and we are not aware of any geophysical constraints. Indeed, in addition to meeting the identified housing need there are other benefits including the opportunity extend amenities or facilities at Hale School or to create a 'softer' edge to the built form of the village, through a sympathetic and high quality design. This land is not of the highest agricultural quality and its development would create a strong defensible boundary for the future.	The Green Belt boundary for Hale will be considered as part of the ongoing Widnes and Hale Green Belt Study. Where considered appropriate as part of the Green Belt Study or for non-Green Belt sites, sites that have been submitted for development have been considered through the Site Assessment process. Proposed sites to be released from the Green Belt are set out in Policy GB TEMP: Green Belt Release Allocations, as well as within other appropriate allocation policies (e.g. Policy ED1: Employment Allocations and RD1: Residential Development Allocations), and can be located on the proposed Policies Map.
00371 Mr R Greenway Robin Greenway & Co (on behalf of Hale Estates) 00371/2/003 QUEST 13.2 Site Allocations	Safeguarded Land Although it may not be necessary at this time to release large areas of Green Belt land to satisfy immediate housing need, the requirement to safeguard presents an opportunity to consider long term strategic growth in an appropriate location. If the Eastern Access Road is implemented, this would then represent a clear defensible western boundary to a safeguarded parcel of land, fronting Hale Road, for long term future housing development. Another potential safeguarded site would be on the northern side of the existing settlement, accessed from Carr Lane. If the figures support a significant expansion of Hale beyond the current Plan period, then this site should be considered as a suitable proposal.	The Green Belt boundary for Hale will be considered as part of the ongoing Widnes and Hale Green Belt Study. Where considered appropriate as part of the Green Belt Study or for non-Green Belt sites, sites that have been submitted for development have been considered through the Site Assessment process. The Council have also used this process to help to identify Safeguarded Land. The Proposed Policies Map sets out the potential allocations and designations for the Borough. Proposed sites to be released from the Green Belt are set out in Policy GB TEMP: Green Belt Release Allocations.

00465 Mr James Roberts Severn Leisure UK Ltd 00465/2/001 QUEST 13.2 Site Allocations	Proposed Site Allocation at Pavilions, Sandy Lane, Runcorn.	This site is noted. Sites submitted for development will be considered through the Site Assessment process. The Proposed Policies Map sets out the potential allocations and designations for the Borough.
00634 Mr Alan Hubbard National Trust 00634/8/001 QUEST 4.1 Evidence Base	There remains some concern about the extent of the evidence base in respect of heritage resources - with no reference to Conservation Area documents such as CA Appraisals or Management Plans, or to Archaeological resources.	The policies in respect of heritage resources in Halton will be informed by a proportionate evidenced base.
00634 Mr Alan Hubbard National Trust 00634/8/002 QUEST 8.6 Connectivity	Policies C6 in particular and also C7 need to consider not only the land requirements of the Airport (and safeguarding its operation) but also the impacts upon environmental assets of new development associated, both directly and indirectly, with the Airport. Specific measures need to be included to ensure appropriate mitigation of adverse environmental impacts and the identification and securing of suitable enhancements.	It has been considered appropriate to review Policy CS17 of the Core Strategy; this policy includes measures to ensure appropriate mitigation. It is also noted that policy CS(R)17: Expansion of Liverpool John Lennon Airport and C4: Operation of Liverpool John Lennon Airport have been informed by a Sustainability Assessment ,Strategic Environmental Assessment and Habitat Regulation Assessment, this will help to ensure that appropriate mitigation measures are incorporated into the policies.
00634 Mr Alan Hubbard National Trust 00634/8/003 QUEST 9.8 Town, District and Local Centres	Generally agreed. In respect of TC8 c) it is recommended that 'significance' is also incorporated; i.e. "...if it would be likely to detract from the function, appearance, significance or setting of the attraction".	Policy HC7: Visitor Attractions has taken this comment into consideration and has been included in criteria 'd'.

00634 Mr Alan Hubbard National Trust 00634/8/004 QUEST 11.6 Sustainable Development in Halton	The text in relation to Policies SD10 and SD11 has suitably addressed the concerns raised by the Trust in March 2014.	Comment is noted. No action is required.
01208 Mr David Trimmingham Turley Associates (on behalf of Peel Holdings) 01208/3/001 ALL All DALP	Peel has major interests in Halton Borough, namely Liverpool John Lennon Airport, the Manchester Ship Canal (including Port Runcorn), the Bridgewater Canal and various landholdings. We have plans to develop a new sustainable urban extension of Speke (known as Mersey Edge) and to extend the runway of Liverpool John Lennon Airport (LJLA) to facilitate growth of both the passenger and cargo businesses. The adopted Airport Master Plan is in the process of being updated to reflect this.	This comment is noted.

01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/002 ALL All DALP	We also believe, in the face of ever increasing competition in the aviation market, that the City Region needs to ensure everything is done to ensure that LJLA is as attractive an option as possible in terms of connectivity and accessibility as crucial elements of the overall passenger experience. At a time when the planned HS3 will bring Manchester Airport within 12-15 minutes travel time of Liverpool City Centre, it is important that the Eastern Access Transport Corridor (EATC) be brought forward as early as possible with assistance from Public Sector Infrastructure funding sources. The EATC is a key infrastructure requirement. It is a proposed new road which will provide a fitting 'front door' route which will enhance the profile and attractiveness of the City Region's International Airport from the M57, M62 and North Wales, matching the direct link into Manchester Airport from the M56. It will bring further wider benefits in relieving traffic on Speke Road/Boulevard, enabling further growth and regeneration in the Speke, Halewood, Garston area; facilitating expansion of LJLA as an international gateway into and out of the region; and improving public transport accessibility in this part of south Liverpool. In addition, it will also facilitate the delivery of Mersey Edge.	Comments in relation to importance of, and aspirations for, LJLA noted. Additional site specific information in the Mersey Edge Development Framework document welcomed and will be fully considered in appraisal of potential allocations. The Proposed Policies Map sets out the potential allocations and designations for the Borough.
01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/003 CHAP I Introduction	Peel welcomes Halton Borough Council's (HBC) acknowledgement of the changes that have occurred since the adoption of the Halton Core Strategy (HCS) in 2013. Peel agrees that these changes are significant and warrant a review of certain parts of the Core Strategy alongside the formulation of site allocations and development management policies. Peel strongly agrees that this should be taken forward without delay and in advance of any Liverpool City Region Strategic Framework.	This comment is acknowledged.
01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/004 CHAP 4 Evidence Base	It is essential that development plans are based on robust and up to date evidence. Peel supports HBC's decision to review and update its evidence base accordingly and to proceed to adoption as expeditiously as possible. It considers that as part of updating the evidence base the plan period should be extended.	This comment is noted. Halton have extended the period covered by the Local Plan to 2037.

01208 Mr David Trimmingham Turley Associates (on behalf of Peel Holdings) 01208/3/005 CHAP Appendix A NPPF Requirements	The NPPF constitutes national policy and must be implemented as a whole. While it is clear that certain elements of NPPF are of particular relevance, none of it can be overlooked. As such, Peel questions the appropriateness or value of highlighting only certain aspects of NPPF in Appendix A of the DASD.	The Council have considered this comment and will endeavour to make it clear that the NPPF should be read as a whole. However, it is still considered that Appendix A provides a useful checklist of the areas in NPPF where it clearly highlights requirements for Local Plan preparation.
01208 Mr David Trimmingham Turley Associates (on behalf of Peel Holdings) 01208/3/006 CHAP Appendices B and C Appendices B and C	There also appears to be a degree of inconsistency between the contents of Appendices B and C. For example, in relation to HCS Policy CSI, Appendix B notes 'no specific requirements', whereas Appendix C notes that the policy will be reviewed as part of the development of policies EI, HI and TC1. Any such inconsistencies should be addressed in future stages of the plan.	The Council will take these comments into consideration to ensure that, if these appendices remain, additional clarity is provided in terms of their content. The Council do not feel that there is any inconsistency between the contents, the appendices have two very different roles. Appendix B highlights where the Core Strategy policies identified that additional policies or information would be provided within the DALP. Whilst Appendix C is setting out whether the policy has already been deleted, is likely to be deleted or is likely to be reviewed and potentially amended, this includes both policies from the UDP and from the Core Strategy.

01208 Mr David Trimmingham Turley Associates (on behalf of Peel Holdings) 01208/3/007 QUEST 2.1 Policy Framework	The DALP should take account of and be consistent with the Government's strategy for the Northern Powerhouse, which seeks to boost growth in the North as a means of rebalancing the UK economy. In formulating the provisions of the DALP, HBC should adopt measures of economic growth, employment and housing stock that reflect the Government's ambitions in this regard. It must also take account of the LEP's Strategic Economic Plan. In the light of the Liverpool City Region Devolution Agreement the DALP will also need to take account of evidence base documents that are likely to emerge during its production. In particular account will need to be taken on the findings of the Liverpool City Region Growth Strategy which it is understood has been commissioned and is likely to be published later this year, and the Strategic Housing and Employment Land Market Assessment (SHELMA) study.	The Council agree that where work commissioned by the Liverpool City Region, such as the Growth Strategy and the SHELMA, is available to feed into the production of the Halton Local Plan it should be taken into consideration.
01208 Mr David Trimmingham Turley Associates (on behalf of Peel Holdings) 01208/3/008 QUEST 2.2 Policy Framework	Peel strongly believes that the DALP should be progressed as expeditiously as possible. Its adoption should not be delayed pending the preparation of any Liverpool City Region Strategic Framework. Any delay would conflict with the Government's objective of ensuring up to date Local Plan coverage as soon as possible and contradict the explicit terms of the Liverpool City Region Devolution Agreement.	The Council concur, and indeed the Devolution Agreement stipulates that work on individual Local Plans should not be delayed pending the production of the Liverpool City Region Strategic Framework.

01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/009 CHAP 4 Evidence Base	However, a number of the key challenges previously raised - relating to both the SHMA and its interpretation into draft policy within the scoping document - remain insufficiently addressed when considering the Mid-Mersey as a whole: - The justification for negative adjustments to the 2012 SNPP/SNHP projection in the context of more recent ONS population estimates and a recognition of historical factors which have impacted on population growth in Warrington and St Helens in particular; - A variant picture regarding the treatment of baseline and 'policy-on' aspects of anticipated economic growth across the Mid-Mersey area. In the case of Halton it is noted that the economic evidence outside of the single economic forecast used within the SHMA is notably dated with the latest Employment Land Study being published in 2010; and - A concern that the OAN across the Mid-Mersey area fails to recognise the need for housing in full and does not represent a significant boosting of supply based on historic levels of development. In our view, a failure to adequately respond to these challenges in the assembling and interpretation of the evidence base will result in unsound planning policy. Given the early stage of the process of developing the DALP, it is considered critical that these issues are considered further and addressed in the next stage of plan preparation.	The Council are content with the evidence and methodology used within the Mid-Mersey and feel that it provides an appropriate OAN for Halton. However, the Council have undertaken further work in relation to their OAN, alongside other authorities from the Liverpool City Region producing a Strategic Housing and Employment Land Market Assessment (SHELMA). It is also likely that an assessment of employment land will be undertaken as part of the preparation of the Local Plan.
01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/010 CHAP 4 Evidence Base	It is clear from the evidence presented within the SHMA that Halton continues to be viewed as being made up of two distinct housing market geographies. This will have an important implication for the future development of policies within the DALP.	The Council have taken a number of elements in to consideration when determining the appropriate housing figure for the Borough (including the split between Runcorn and Widnes), this will include (but not be limited to) the objectively assessed need identified in the evidence provided for both the Liverpool City Region and the Mid-Mersey, the results of this consultation and the policies of the NPPF.

01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/011 CHAP 4 Evidence Base	Peel has concerns regarding the work to date on the draft Widnes and Hale Green Belt Study. These concerns relate to its methodology, approach and relevance as part of the evidence base of the DALP. These concerns can be summarised as follows: a) The review of Green Belt boundaries should take account of the need to promote sustainable patterns of development, the work undertaken on the Green Belt Study takes insufficient account of the sustainability of the potential releases under consideration. Its method and approach focus on consideration of land parcels without proper consideration of whether the development of such land for a given use would be sustainable. We are concerned that the Study is therefore not a suitable basis for undertaking Green Belt review. b) A proper evidence-based Green Belt assessment cannot be completed until the scale and nature of release is known and the type of development for which land is required. This will need to be reviewed in the light of the updated evidence base as will any need for development for other purposes. No firm conclusions on GB release can be drawn before the outcome of such a review is clear. In the light of this is considered that the Study to date is not fit for purpose and that HBC must promptly undertake a full and proper review of Green Belt boundaries in the north of the Borough once the extent of development needs is clear.	The Council consider the Green Belt Study as an iterative document that may continue to evolve as sites are considered in the Halton Local Plan and as and when more information becomes available. The Green Belt Study work published to date, fully acknowledges the points raised about a "... proper assessment cannot be completed until the scale and nature of release is known and the type of development for which land is required" and "No firm conclusions on GB release can be drawn before the outcome of such a review is clear".
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01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/012 CHAP 4 Evidence Base	In addition, in accordance with national planning policy, in reviewing Green Belt boundaries, HBC must identify safeguarded land to meet longer term development needs stretching well beyond the plan period. The DASD makes no reference to this. This is a key omission.	The DALP Scoping Document 2016 did include SD3: Safeguarded Land, which stated that the aim of the policy would be to <i>‘Ensure that an appropriate level of land is safeguarded for future needs’</i>. The Revised Core Strategy Policies and Delivery and Allocations Publication Document includes a Green Belt section, this has a proposed policy GB2: Safeguarded Land, the introduction to this policy sets out that <i>‘Safeguarded Land is land between the existing urban area and the Green Belt boundary that is required to meet future longer-term development needs that stretch beyond the period of the Local Plan’</i>.
01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/013 CHAP 4 Evidence Base	The growth and regeneration of Halton will require upgraded and/or new physical infrastructure. The need for, and means to deliver this should be addressed as part of the evidence base for the DALP. HBC has prepared an infrastructure Plan based on the Core Strategy. This will need to be reviewed and updated to apply to any revised development needs within the DALP and any other changes of circumstances since the last review of the Infrastructure Plan. Such a review will need to consider what infrastructure is needed in order to deliver the growth that Halton aspires to, when it will need to be provided and how it will be delivered. Where relevant this will need to include consideration of potential sources of funding for such infrastructure.	It is agreed that Halton will need to update the Infrastructure Plan in line with the needs of the development proposed in the DALP.

01208 Mr David Trimmingham Turley Associates (on behalf of Peel Holdings) 01208/3/014 QUEST 5.1 Vision and Objectives	Peel agrees that providing a "balanced housing offer which is appropriate to local housing markets and ultimately supports the Borough's economic growth" remains a challenge which the DALP should address. In this context it is considered that the Strategic Objectives of the DALP should include boosting the supply of 'aspirational' and family homes and to ensure the housing needs of both the Widnes and Runcorn areas are fully met.	In accordance with NPPF the local plan will support strong, vibrant and healthy communities, by planning for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community.
01208 Mr David Trimmingham Turley Associates (on behalf of Peel Holdings) 01208/3/015 QUEST 5.2 Vision and Objectives	Peel supports the positive overarching vision for Halton and the spatial vision that flows from this. It is considered that planning to 2028 is no longer sufficient. This would be only 10 years beyond the "best estimate" of the adoption date of the DALP. It is considered that this period should be a minimum of 15 years in order to enable long term investment in regeneration and growth. The DALP should extend to at least 2033 and, in view of the timeframe of the SHMA, it could be extended to 2037.	The Council agrees with Peel and are extending the plan period for the Local Plan to 2037.

01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/016 QUEST 5.3 Vision and Objectives	Peel supports the Strategic Objectives of the HSC, subject to the following detailed comments (adopting the paragraph numbers used in the DALP): - The reference to Runcorn Waterfront at paragraph 5.7 will need to be amended to reflect Peel Ports' intentions to continue to operate and grow the port activities of Port Runcorn; - Paragraph 5.8 should be amended to make reference to the Manchester Ship Canal and Port Runcorn as significant and growing transport and employment assets; - The spatial vision at paragraph 5.14.1 should be amended to make reference to Green Belt review and the development of high quality sustainable urban extension(s) to meet the housing needs of the northern part of the borough; - Paragraph 5.14.2 should be amended to make specific reference to Halton's need for additional 'aspirational' and family homes, to ensure a more balanced housing stock that best supports its economic aspirations; - An additional Strategic Objective should be added to ensure that the distinct housing needs of the whole borough are met by making appropriate provision within both the northern and southern market sub-areas within the borough.	Due to the limited nature of changes requested the Council are not intending to amend the Vision or Strategic Objectives of the adopted Local Plan Core Strategy. However, the Council taken on board the comments made and these will be reflected in the policies of the Revised Core Strategy Policies and Delivery and Allocations document and on the Proposed Policies Map.
01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/017 QUEST 6.1 Supporting Halton's Economy	Peel supports the DALP's positive approach to economic growth issues and challenges in Halton and the recognition of the wider benefits such growth can bring in relation to regeneration, prosperity and quality of life. The recognition of the important impact that planned and on-going investment in economic sites and transport infrastructure is supported. It is evident that the authority continues to seek to restructure its economy to improve its resilience and the breadth of jobs available to its resident workforce.	This comment is noted.

01208 Mr David Trimmingham Turley Associates (on behalf of Peel Holdings) 01208/3/018 QUEST 6.1 Supporting Halton's Economy	Peel considers it essential that Halton continues to respond to wider opportunities for growth as well as those within its own authority boundary, for example, through making provision for the expansion of Liverpool John Lennon Airport, promoting SuperPort and associated growth in logistics and distribution, and the opportunities presented by a vibrant and well-utilised Manchester Ship Canal. At paragraph 8.5 of the DALP the locational benefits enjoyed by the authority associated with rail links, waterway, ports and the Airport alongside are recognised. These locational benefits should be emphasised further within this section in the context in particular of realising opportunities associated with unmet SuperPort demand recognising its sub-regional impact. The opportunities for new employment generated by SuperPort are highly sensitive to location, access to national infrastructure networks and journey times to the Port and major centres of population.	This comment is noted and further consideration will be given to the wider opportunities as part of the ongoing work on the preparation of the Local Plan.
01208 Mr David Trimmingham Turley Associates (on behalf of Peel Holdings) 01208/3/019 QUEST 6.1 Supporting Halton's Economy	Peel support the identification of the balance between the supply of new homes and the creation of new job opportunities as a key challenge in ensuring that the economic potential of the area is realised and new investment is attracted. The review of the SHMA in section 4 of these representations identified a specific concern with regards to the limited available economic forecasting information for the authority. Currently referenced forecasts are considered to potentially underplay the economic growth potential of the authority at a baseline level and indeed when recognising the scale of investment being delivered and in the pipeline. Developing a robust evidenced assessment of the impact of planned investment above and beyond forecast baseline job growth will be critical to ensure that other aspects of the plan, including the provision of housing, do not serve to undermine the capacity of the authority to generate new employment opportunities.	The Council have worked, and will continue to work with the LEP and other City Region Authorities in relation to detailed economic forecasting. This evidence has been fed into the LCR SHELMA, and used to produce both the housing and employment figures. These figures are set out in the Revised Core Strategy Policies and Delivery and Allocations and have been used as part of the evidence to support the housing and employment requirements set out in policy CS(R)1: Halton's Spatial Strategy.

01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/020 QUEST 6.1 Supporting Halton's Economy	Developing a robust evidenced assessment of the impact of planned investment above and beyond forecast baseline job growth will be critical to ensure that other aspects of the plan, including the provision of housing, do not serve to undermine the capacity of the authority to generate new employment opportunities. As set out in section 4 it is recognised that this will form an important aspect of the SHELMA study which is currently progressing across the Combined Authority. Peel consider that this work represents a critical part of the evidence base for ensuring that housing and employment needs are aligned and robustly translated into policy. Evidently the outputs of this work were not available at the time the DALP was prepared but it will be important that through future stages the DALP provides adequate recognition of the impact of investment across the wider area. Peel reserve a position to respond more fully as the outputs of the SHELMA are released.	This comment is noted.
01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/021 QUEST 6.2 Supporting Halton's Economy	Peel consider it important that the opportunity posed by the Government's strategy for the Northern Powerhouse, which seeks to boost growth in the North as a means of rebalancing the UK economy is recognised within the DALP. In formulating the provisions of the DALP, HBC should adopt measures of economic growth, employment and housing stock that reflect the Government's ambitions in this regard.	It is considered that the sustainable development and regeneration of Halton will contribute to the Northern Powerhouse.

01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/022 QUEST 6.2 Supporting Halton's Economy	Peel considers that issues around the viability of delivering employment land should be recognised more clearly within the section. Reference is made at paragraph 6.4 to problems associated with the range of sites and premises on offer recognising in Widnes the issue of 'despoiled former industrial land'. Challenges associated with addressing potential abnormal costs, for example, will have implications for the viability balance and it will be important that the cumulative impact of policies does not undermine development viability. Recognition of this issue here will provide an important context for the drafting of responsive policies.	The Council have given further consideration to the issue of viability and have sought to include reference to viability within appropriate policies e.g. within the Justification for Policy CS(R)1: Halton's Spatial Strategy, or within Policy H3: Affordable Housing. It should be noted that a whole plan viability assessment will be undertaken as part of the production of the Local Plan.
01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/023 QUEST 6.4 Supporting Halton's Economy	Peel supports the inclusion of Options 6.ID and 6.IE which consider increased levels of growth above those indicated by baseline economic forecasts and historic take-up.	This support is noted, and will be taken into consideration when determining the appropriate level of employment land requirement.
01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/024 QUEST 6.4 Supporting Halton's Economy	It is apparent throughout the DALP that there is an expectation that the scale of ongoing and planned investment will deliver a step-change in the economic growth prospects of the borough. Historic trend-based forecasts of growth and need will not reflect this change and would serve to under-estimate likely growth and need as a result.	The Council considers that an appropriate level of homes and employment opportunities to meet the OAN and create a sustainable balance for the Borough are set out in Policy CS(R)1: Halton's Spatial Strategy.

01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/025 QUEST 6.4 Supporting Halton's Economy	In respect of the Location of Employment Land (Section 6.2) it is likely that a combination of the identified Options 6.2A-D will be necessary in response to meeting future requirements. This may need to involve new greenfield sites particularly where located around key transport routes and in proximity to existing employment areas.	This comment is noted and has been taken into consideration whilst drafting policies and considering sites for allocation. The proposed allocations are set out Policy ED1: Employment Allocations and can be located on the proposed Policies Map.
01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/026 QUEST 6.4 Supporting Halton's Economy	Likewise the Protection of existing Employment Land (Section 6.3) will require a combination of solutions to ensure the appropriate mix and type of employment and housing land overall. A simple emphasis on either protecting or releasing employment land is unlikely to be appropriate. Some smaller and more constrained sites may be appropriate for housing or other development, whilst larger and more important sites may merit stronger protection. We note that the Government's recent consultation on Starter Homes may also put additional pressure on employment land.	This comment is noted and has been taken into consideration whilst drafting Policy CS(R)4: Employment Land Supply.
01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/027 QUEST 7.1 Housing	Peel welcomes the recognition of the need for more aspirational and family homes (at paragraph 7.1 and 7.3). It considers that this should be reflected in the Strategic Objectives (see above) and in the application of policies.	Due to the limited nature of changes requested the Council are not intending to amend the Strategic Objectives of the Plan. However, this comment has been taken into consideration whilst drafting policies.
01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/028 QUEST 7.2 Housing	Peel welcomes the recognition that Green Belt release will be needed for Halton to meet its full housing needs (paragraph 7.13). It considers that the challenge in delivering this will be to achieve the most sustainable locations for the required housing. Provision will also need to be made for safeguarded land.	The Council will seek to release appropriate sites from the Green Belt for allocation and for safeguarding. The proposed sites to be released are set out in GBTEMP: Green Belt Release Allocations and GB2: Safeguarded Land.

01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/029 QUEST 7.2 Housing	The DALP will also need to set out its approach to delivery of Starter Homes.	This comment is noted and has been taken into consideration in the drafting of Policy CS(R)13: Affordable Housing. Further text may be added in relation to Starter Homes as and when there is sufficient detail available from Government.
01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/030 QUEST 7.2 Housing	The DASD makes no mention of the viability of development and how this will be taken into account in housing delivery and agreement of planning obligations. This is an important matter which needs to be addressed as part of the plan making process.	The Council agrees that viability of development is an important matter which should be addressed as part of the plan making process. And it should be noted that in the DALP Scoping document the final column of the policy scope did highlight where the Council considered that the policy may have a viability cost. Whilst the Evidence Base section of the document did include a Borough Development Viability Study which will be used to assess the economic viability of development. The Council have given consideration to the issue of viability in drafting the Revised Core Strategy Policies and Delivery and Allocations and have sought to include reference to viability within appropriate policies e.g. within the Justification for Policy CS(R)1: Halton's Spatial Strategy, or within Policy H3: Affordable Housing. It should be noted that a whole plan viability assessment will be undertaken as part of the production of the Local Plan.
01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/031 QUEST 7.3 Housing	Peel considers that it will be important to ensure that the options have consideration of the outcomes of the SHELMA once it is published.	The Council have given consideration to the outcomes of the SHELMA as part of the preparation of the Local Plan.

01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/032 QUEST 7.3 Housing	Peel considers that it would be beneficial to include additional options looking at levels above the OAN which are robustly justified in the context of supporting specific policy objectives, for example job growth which reflects the pipeline of investments and the plans for key employment sites across the borough.	The Council considers that an appropriate level of homes and employment opportunities to meet the OAN and create a sustainable balance for the Borough are set out in Policy CS(R)1: Halton's Spatial Strategy.
01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/033 QUEST 7.4 Housing	Of the options consulted on, Peel considers option 7.1B (to have a housing requirement higher than the OAN to allow for an increase in working age people in the Borough and to increase the levels of affordability in the Borough) is the most appropriate with regards to the overall number of dwellings to be provided for. Additional options to consider additional economic growth should be considered (see Q7.3). This recognises the concern stated in the representations on the evidence base that the SHMA may under-estimate the full need for housing, with particular reference to the potential scale of job growth to be realised and sought in the authority. This will ensure a greater degree of flexibility in the provision of housing to support the economic growth of the borough by ensuring a potentially greater level of working age persons. It will also ensure flexibility, as required, to reflect on the conclusions of the forthcoming SHELMA. The SHMA confirms that there continues to be a sustained need for affordable housing in Halton. Providing for a level of housing which exceeds the OAN will present a greater opportunity to positively address this need and ensure a more balanced housing market in the future in Halton. This will also ensure that the ambitions for economic growth as part of the Government's Northern Powerhouse agenda are realised.	The Council considers that an appropriate level of homes and employment opportunities to meet the OAN and create a sustainable balance for the Borough are set out in Policy CS(R)1: Halton's Spatial Strategy.

01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/034 QUEST 7.5 Housing	Peel welcomes the recognition of the potential for housing market sub-areas to be provided for. In the past, policies have provided for separate housing requirements for the Runcorn and Widnes/Hale areas. It is noted, as set out in the review of the SHMA, that the latest evidence implies a greater level of need in Widnes than Runcorn with this projected forward based upon demographic projections alone. This should be reviewed in the light of the full need for housing allocations and the potential implications of other changes in the borough during the plan period, such as the opening of the Mersey Gateway and the distribution of anticipated new employment opportunities.	The Council considers that an appropriate level of homes and employment opportunities to meet the OAN and create a sustainable balance for the Borough are set out in Policy CS(R)1: Halton's Spatial Strategy. The proposed proportion of homes to be provided in each sub-market area (Runcorn and Widnes & Hale), is set out in Policy CS(R)3: Housing Supply and Locational Priorities. This split is considered to best reflect the range of evidence available including the SHMA, SHELMA, SHLAA and Green Belt Study.
01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/035 QUEST 7.6 Housing	Peel agrees that policies which are based upon updated evidence, which as the DALP identifies includes Policies CSI, 3, 12 and 13, should be replaced to reflect the latest justified evidence based position in compliance with the NPPF.	This comment is noted.
01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/036 QUEST 7.7 Housing	Peel considers that it would be beneficial to have a policy directly addressing the identified need for larger family homes. It is recognised that currently this falls within Policy No. H1 but it is considered that it would carry greater weight if it is identified as a separate policy.	The Council do not feel that it is necessary to have a separate policy on larger family homes. It is considered more appropriate to include a policy on ensuring an appropriate housing mix, based on current evidence.

01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/037 QUEST 7.8 Housing	Peel considers that it would be beneficial to have a policy directly addressing the identified need for larger family homes. It is recognised that currently this falls within Policy No. H1 but it is considered that it would carry greater weight if it is identified as a separate policy. See comments at paragraph 7.13 in relation to the justification for a policy dealing directly with larger family and aspirational homes.	The Council do not feel that it is necessary to have a separate policy on larger family homes. It is considered more appropriate to include a policy on ensuring an appropriate housing mix, based on current evidence.
01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/038 QUEST 8.1 Connectivity	Peel welcomes the recognition of the connectivity benefits which accessibility to Liverpool John Lennon Airport (LJLA) brings. The growth of LJLA airport and associated employment delivers benefits at a City Region scale including within Halton.	This comment is noted, no action required.
01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/039 QUEST 8.1 Connectivity	Peel welcomes the recognition (paragraph 8.5) of the opportunities that the Liverpool SuperPort concept brings to grow the logistics and distribution sector within the sub-region.	This comment is noted, no action required.
01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/040 QUEST 8.1 Connectivity	LJLA is in the process of reviewing and updating its Masterplan. This will set out growth plans to 2030 and beyond. Initial evidence gives confidence that LJLA can deliver growth in business and leisure passenger numbers which is at least at the level projected in the Department for Transport Passenger forecasts. This includes addition of medium and long haul routes. There is also potential to grow the cargo handling business at the Airport and develop a logistics/distribution cluster that takes advantage of the Airport's location, relationship to SuperPort, and helps meet wider identified land requirements in this sector.	This comment is noted. It is also noted that the Airport is updating its Masterplan, which the Local Plan will seek to take account of.

01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/041 QUEST 8.2 Connectivity	Delivering the infrastructure needed to sustain growth is a key challenge for all development plans. An up to date Infrastructure Plan will be a vital part of the evidence base of the DALP. This will form the basis of any potential business case for support in the delivery of infrastructure that is of more than local importance. In this context it is vital that the DALP has a clear Infrastructure Plan which can form the basis of engagement with, for example, the LEP regarding its transport and investment priorities.	The Infrastructure Plan will be reviewed alongside the production of the Local Plan.
01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/042 QUEST 8.2 Connectivity	Infrastructure such as the Eastern Access Transport Corridor (EATC) could deliver significant benefits. Its route straddles the administrative boundary between Halton and Liverpool. The benefits it could deliver are of City Region scale. They include: - Upgrading the approach to a growing regional Airport. Creating a more direct and convenient route to LJLA would enhance its profile as a national and international gateway to the Liverpool City Region; - Creating transport capacity in the South Liverpool International Gateway. The areas around Speke, Halewood and Garston Lane have seen significant economic, social and physical regeneration. This has resulted in increased pressure on transport infrastructure, particularly at peak hours. The delivery of the EATC would 'free up' some of this capacity e.g. on the Speke Road/Speke Boulevard corridor to enable further regeneration and growth; - Creating additional capacity through the EATC would also facilitate additional development and growth around the Airport which would help to meet identified needs for housing and employment across Halton and Liverpool.	These comments are noted. The operation and expansion of LJLA in line with its 2007 Master Plan will in principle be supported, including proposals for a runway extension and the new Eastern Access Transport Corridor (EATC).

01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/043 QUEST 8.2 Connectivity	Port Runcorn is a thriving port on the Manchester Ship Canal (MSC). Peel has recently confirmed that it is likely to remain in port use during the plan period. This reflects a resurgence of demand for freight carriage on the MSC. Further growth of this sector is anticipated once the new deep water container terminal at the Port of Liverpool (Liverpool2) is operational. In this context it is important that the capacity and utility of facilities such as Port Runcorn is safeguarded. Peel therefore requests inclusion of as policy as follows: "Opportunities for freight transport via the Manchester Ship Canal should be maximised and new links to these networks should be encouraged. The Manchester Ship Canal has significant potential to support jobs, increase economic activity and to take freight traffic off the road helping to meet climate change objectives. Peel Ports have key facilities which are able to contribute to this objective, some existing such as the Port Runcorn and the Ineos complex".	The updated intentions from the land owner concerning their aspirations for their land holdings in West Runcorn are noted. These represent a significant departure from the Core Strategy and the implications of this will be discussed further with the land owner and taken into account in the Local Plan.
01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/044 QUEST 8.3 Connectivity	Peel supports the proposed scope of policies C6 and C7 in relation to LJLA. As mentioned above, LJLA is reviewing its Masterplan and it will be please to share the contents of this with the Council as it emerges.	This comment is noted.
01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/045 QUEST 10.1 Halton's Environment	Peel welcomes the recognition of LJLA's Public Safety Zones (PSZ) and Aerodrome Safeguarding Zones. LJLA would be pleased to provide up to date representations of these areas to ensure that the Airport's requirements are accurately reflected in the DALP. It is considered helpful to show the boundaries of the Airport PSZ and Safeguarding Zones on the proposed DALP policies map.	This comment is noted.

01208 Mr David Trimmingham Turley Associates (on behalf of Peel Holdings) 01208/3/046 QUEST 11.1 Sustainable Development in Halton	Green Belt is not an environmental designation. It is a planning policy. The environmental quality of land or lack of it is irrelevant to decisions about including or excluding land from Green Belt. Reference to Green Belt should be removed from this chapter.	The Green Belt policies have been given their own section of the document to avoid any issue of clarity.
01208 Mr David Trimmingham Turley Associates (on behalf of Peel Holdings) 01208/3/047 QUEST 11.1 Sustainable development in Halton	Peel firmly believes that this section of the Local Plan should also include issues and challenges in relation to the economic and social aspects of sustainable development in addition to the environmental issues currently listed. In summary Peel considers these to be: - The need to secure sustainable economic growth to improve employment and within the Borough by utilising the assets of Halton. - The need to fund new infrastructure and improve health and well-being and to tackle inequalities within the Borough. To achieve sustainable development the Local Plan must develop preferred options that balance these economic, social and environmental issues and challenges.	These comments have been taken into consideration whilst drafting the Revised Core Strategy Policies and Delivery and Allocations. It should also be noted that the document has been subject to Sustainability Appraisal which has informed the proposed policies and help to ensure the appropriate balance between economic, social and environmental benefits.

01208 Mr David Trimmingham Turley Associates (on behalf of Peel Holdings) 01208/3/048 QUEST 13.2 Site Allocations	Submissions have been made in response to the Call for Sites in respect of the following proposals: - Extension of the runway at LJLA - provision for a westward extension of the runway and associated safety zones to enable use by larger more efficient aircraft and facilitate access to medium and long haul destinations; - Mersey Edge sustainable urban extension - a sustainable urban extension comprising either: 1,000 homes and 7.25 ha of B1, B2, B8 use; or 1,370 homes; together with Associated landscaping, public open space and provision for extension of the adjacent primary school if shown to be required. - Land at East Runcorn - development of a c.150 new homes, 1,500 sq m of commercial leisure space at Preston Brook Marina on the Bridgewater Canal.	Information on the three sites are noted. Sites submitted for development (including Mersey Edge and Preston Brook Marina) will be considered through the Site Assessment process. Policy treatment to improve runway end safety and runway expansion will be addressed separately.
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01208 Mr David Trimmingham Turley Associates (on behalf of Peel Holdings) 01208/3/049 QUEST 12.3 Key Areas of Change	The Canal should be a focal point for new development in the Borough particularly in Runcorn and the Daresbury Strategic Site. The opportunities that the Canal and its corridor present should be fully embraced within this important growth area. Policy CS11 of the Core Strategy states that the Daresbury Strategic Site will deliver a "mixed use local centre including a marina providing moorings for inland waterways craft sited alongside the Bridgewater Canal around the existing George Gleave's bridge" (CS11d). The use of the Canal and its towpaths will increase as a result of development in the areas around the Canal and of the growth and regeneration of Runcorn generally. It is essential that the Local Plan recognises this and both makes provision for increased use to be accommodated, and for the long term safeguarding and maintenance of the Canal as a key asset to the borough. This is recognised in the existing Local Plan and it is vital that this recognition is carried forward in to the DALP. The Canal and its corridor needs to be improved and the improvements / enhanced maintenance costs need to be paid for by contributions from developments in the vicinity of the Canal, and delivered via planning contributions. This principle is recognised within CS11 and the Council's Infrastructure Plan which states: "Given that the level of usage of the canal and its towpath is likely to increase following the realisation of the aspirations for the area, improvements to the canal will be required. In addition to the enhancements identified in the East Runcorn Sustainable Transport Study, the Bridgewater Way Initiative exists as the appropriate vehicle through which to direct funds or contributions for improvements to the Bridgewater Canal towpath in the vicinity of the Daresbury Strategic Site".	It is agreed that Halton's Waterways make a valuable contribution to the Borough, and that there may be potential for further enhancement this is addressed in Policy HE3: Halton's Waterways and Waterfront's The Open Space SPD make provision to secure appropriate financial contributions from development that will directly lead to increased usage of the canal and towpaths to secure improvements and to be delivered through the Bridgewater Trust.
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01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/050 QUEST 12.3 Key Area of Change	The Infrastructure Plan goes on to identify "Section 106 contributions from development / Community Infrastructure Levy" as potential funding sources for the Bridgewater Way (pages 86, 93 and 97). As the Council recognises, pooling planning contributions from individual schemes / phases is an effective way of securing such funds and should be promoted. In line with part 2 of Policy CSI I within the adopted Local Plan Core Strategy, contributions should be pooled to ensure the delivery of key objectives within the East Runcorn 'Key Area of Change' and Daresbury Strategic Site which sits within this wider area. Coverage within the DALP	The Open Space SPD make provision to secure appropriate financial contributions from development that will directly lead to increased usage of the canal and towpaths to secure improvements to be delivered through the Bridgewater Trust.
01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/051 QUEST 12.3 Key Area of Change	BCC welcomes the recognition of the Bridgewater Canal in the DALP. It supports the proposed scope of Policy HE3 including specific policy provision for seeking contributions from development to invest in upkeep and improvement of the Bridgewater Canal. BCC considers that the DALP should also include support for the role of the Bridgewater Canal in the transport/connectivity, sports and recreation/leisure, heritage/culture, tourism, green infrastructure and open space policies.	The Council have given further consideration to the role of the Bridgewater Canal and other waterways in the Revised Core Strategy Policies and Delivery and Allocations document and has included references in a wider selection of policies eg transport and visitor attractions.

01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/052 QUEST 12.3 Key Areas of Change	The DLAP will include detailed allocations and a new proposals map. It is important that this includes an illustrative plan for the Daresbury area based on an update of the existing plan at policy CSI I of the Core Strategy. This shows critical infrastructure needed to make sure that Daresbury fulfils its role as a truly strategic and transformational scheme for Halton and the wider region. The delivery of a marina, local centre and new crossings of the Bridgewater Canal should be retained. These are essential to the fulfilment of the policy objectives for the Daresbury Strategic Site and the Bridgewater Canal. BCC is concerned that schemes currently being promoted as planning applications at Daresbury do not comply with CSI I as they do not maximise the potential of the Canal and its corridor and do not include the critical infrastructure which is needed. The retention and strengthening of this policy provision is therefore essential to ensure that the sense of place to which waterways such as the Bridgewater Canal contribute, is retained and enhanced.	The DALP will where necessary review and update policy CSI I in light of the latest information. It is envisaged that sufficient technical and financial/viability information should be available to allow the allocation of discrete areas, without the need to resort to 'illustrative plans'. The Council looks forward to working with Peel / Bridgewater Trust to secure the evidence in support of the new marina and other improvements.
01208 Mr David Trimingham Turley Associates (on behalf of Peel Holdings) 01208/3/053 QUEST 12.3 Key Areas of Change	The DALP should also translate the intentions of the Infrastructure Plan into policy. This should include explicit provisions whereby contributions to works to maintain and improve the Bridgewater Canal will be collected through S106 obligations on relevant developments and/or CIL contributions.	The Opens Space SPD make provision to secure appropriate financial contributions from development that will directly lead to increased usage of the canal and towpaths to secure improvements delivered through the Bridgewater Trust.

01236 Mr Steve Matthews Sefton Council 01236/3/001 QUEST 4.1 Evidence	Sefton Council welcomes the reference to the Liverpool City Region Strategic Housing and Employment Land Market Assessment (SHELMA) as a key part of the Halton Delivery and Allocations Local Plan (DALP.) It is Sefton council's position that employment land requirements arising from Liverpool Super Port expansion are best considered at the Sub regional level through the SHELMA rather than a piecemeal approach where each local authority considers its impact in isolation from the other Local Authorities in the Liverpool City Region. It is considered that as the impact of the Super Port expansion will be felt across the sub region, the most logical scale at which the need can be analysed and quantified is at the sub regional level.	Support is noted. The Council will continue to work with the other authorities in the LCR in relation to the SHELMA and other appropriate evidence. No action is required.
01236 Mr Steve Matthews Sefton Council 01236/3/002 QUEST 4.1 Evidence	It is considered that the Halton Open Space Study (PMP and HBC, 2006) will need to be updated as it is now substantially out of date and there has been significant changes to national/policy guidance since its production.	The comment in relation to the Halton Open Space Study is noted. Work is currently underway to prepare a Playing Pitch Strategy and Open Space Audit. Reference to the Open Space Audit will be included in further documents produced.
01236 Mr Steve Matthews Sefton Council 01236/3/003 QUEST 5.1 Vision and Objectives	Halton may wish to consider whether a new Single Local Plan may be a more appropriate way forward due to the different level of OAN for housing (as for example St Helens have done).	Halton have considered the potential to prepare a Local Plan, and have decided the most appropriate route forward at this time is to prepare a DALP with a wider scope, now known as the Revised Core Strategy Policies and Delivery and Allocations document.
01236 Mr Steve Matthews Sefton Council 01236/3/004 QUEST 9.6 Town, District and Local Centres	With regard to the potential policy TC9- Evening Economy) Sefton has proposed a similar policy on Hot Food Takeaways near schools in its Local Plan which is currently being examined. It is considered that the Sefton Local Plan Inspectors report may well be of interest in informing Halton Council's approach. Other examples of Hot Food Takeaways policies being found sound include Preston and Wandsworth Local Plans.	This comment is noted.

01236 Mr Steve Matthews Sefton Council 01236/3/005 QUEST 12.2 Key Areas of Change	Should Halton wish to include a port related policy for the port of Runcorn, (West Runcorn area of change); policy ED1 of the emerging Sefton Local Plan may be of interest in informing Halton Councils approach.	Comment is noted.
01254 Matthew Good Home Builders Federation Ltd 01254/2/001 QUEST 2.1 Policy Framework	Whilst it is recognised that the recent devolution agreement is not intended to delay the production of plans there are several pieces of work currently being undertaken at this level which will have a direct bearing upon the plan and will need to be taken into account. These include the 'City Region-wide Growth Strategy' which was commissioned by the Liverpool City Region Combined Authority (CA) late in 2015, with publication anticipated during summer 2016, and the joint 'Strategic Housing and Employment Land Market Assessment'. Failure to take account of this regional work would jeopardise both the soundness of the plan and compliance with the Duty to Co-operate. These and other city region-wide studies and strategies will need to be fed into the local plan and appropriate actions included.	The Council agree that where work commissioned by the Liverpool City Region, such as the Growth Strategy (Building our Future (2016)) and the SHELMA, is available to feed into the production of the Halton Local Plan it should be taken into consideration.

01254 Matthew Good Home Builders Federation Ltd 01254/2/002 QUEST 2.2 Policy Framework	The HBF considers that it would be beneficial to undertake work upon allocations and update relevant sections of the Core Strategy in advance of the Liverpool City Region Strategic Framework, providing this can be achieved in a timely manner. This will provide greater certainty to enable the delivery of much needed housing within Halton in the short to medium-term. It is, however, noted that the adoption of the Delivery and Allocations Local Plan document is unlikely to occur prior to 2018. The Council may, therefore, need to consider other mechanisms to ensure an adequate supply of land is maintained in the interim. The timescale for the production of the Liverpool City Region Strategic Framework is unknown and as such it would not appear appropriate to wait indefinitely for this work to commence and progress through the various stages of plan-making. It is, however, clear that the city region framework and its evidence base will have significant implications for the Delivery and Allocations Local Plan. It is therefore essential that the Delivery and Allocations Local Plan takes account of the emerging evidence and also provides clear and robust early review mechanisms to ensure that the plan responds appropriately to the eventual production and adoption of a Liverpool City Region Strategic Framework.	The Council concur with the HBF that it would not be appropriate to wait indefinitely for the production of the Liverpool City Region Strategic Framework. However, where evidence is available to feed into the production of the Halton Local Plan the Council will take it in to consideration. The Council will also endeavour to ensure that the Local Plan provides appropriate mechanisms and flexibility to take the Liverpool City Region Strategic Framework into account.
01254 Matthew Good Home Builders Federation Ltd 01254/2/003 QUEST 6.2 Supporting Halton's Economy	In addition to the issues identified regarding economic growth the Council should also consider the positive economic benefits which are provided as a result of house building and the additional jobs which could be provided locally if an increase to housing delivery were to be achieved. The HBF has recently published two reports which consider the economic impact of house building, 'Building Communities: Boosting Employment' and 'The economic footprint of UK house building', both can be accessed via our website at www.hbf.co.uk. The economic footprint report is supplemented by regional reports which highlight the benefits provided to individual local authorities over the last year.	This comment is noted.

01254 Matthew Good Home Builders Federation Ltd 01254/2/004 QUEST 7.1 Housing	The issues and challenges identified, whilst limited in detail, are considered appropriate to be addressed through the Delivery and Allocations Local Plan.	This comment is noted.
01254 Matthew Good Home Builders Federation Ltd 01254/2/005 QUEST 7.2 Housing	Yes, other important issues which require consideration include ensuring that the employment and housing strategies within the plan and city region align, the approach the Council will take towards Starter Homes and issues of economic viability.	This comment is noted. The council have taken these additional issues in relation to the alignment of employment and housing, Starter Homes and economic viability into account during the preparation of the Local Plan.
01254 Matthew Good Home Builders Federation Ltd 01254/2/006 QUEST 7.2 Housing	With regards to the issues surrounding density noted within paragraph 7.13, whilst the impact upon character will undoubtedly be an issue, the Council will also need to consider the impact increased densities could have upon other policies such as amenity, open space, design and housing mix. The HBF therefore recommend that a flexible approach to density is employed within the plan.	This comment is noted and has been taken into consideration whilst drafting the policy on density.
01254 Matthew Good Home Builders Federation Ltd 01254/2/007 QUEST 7.4 Housing	Housing 7.1 - number of dwellings The HBF support Option 7.1B 'To have a housing requirement higher than the OAN to allow for an increase in working age people in the Borough and to increase the levels of affordability in the Borough (and meet other LA's housing need)', albeit the option should reference the need to align the employment and housing strategies of the Council and city region, as identified by the NPPF and PPG (2a-018). The recent interim conclusions of the Inspector of the Cheshire East Local Plan Strategy, dated 12th November 2014, clearly identify the folly of not aligning employment and housing strategies.	The Council considers that an appropriate level of homes and employment opportunities to meet the OAN and create a sustainable balance for the Borough are set out in Policy CS(R)1: Halton's Spatial Strategy.

01254 Matthew Good Home Builders Federation Ltd 01254/2/008 CHAP 4 Evidence Base	The HBF does have a number of concerns regarding its derivation. The HBF notes the 2016 SHMA and its recommendations and whilst a detailed review of the data and assumptions contained within the 2016 SHMA has not, at this stage, been undertaken the overall methodology generally appears to accord with the principles set out within the NPPF and PPG. The HBF concerns lay with the choice of scenarios used within the study which may lead to a suppression of the overall housing need figure. In this regard it is considered that 466dpa is unlikely to represent the full OAN for the area and there appears justification for an increase. Concerns are raised by the HBF include: - The scenarios which utilise UPC need to be considered in greater detail to ensure that they are soundly based. - The use of long-term migration trends, without further modification, would have provided useful context for the different authorities as a scenario in the SHMA. - The study does not provide analysis of historic factors, which may have implications upon the future rate of both population and housing growth. - The 2016 SHMA does not provide sensitivity testing of the economic assumptions it uses to ascertain whether they are overly optimistic. - It is also notable that the assumptions used upon economic activity deviate from the official Office of Budgetary Responsibility (OBR) forecasts on such rates. This will need to be robustly defended. - Whilst it is recognised that the market signals across Halton are not as acute as elsewhere it is apparent that there remain issues with regards to affordability, identifying a need for 119 affordable units per annum, an increase in overcrowding and under-delivery. - The need to align the economic and housing strategies not only for Halton but also the wider Liverpool City Region	The Council are content with the evidence and methodology used within the Mid-Mersey and feel that it provides an appropriate OAN for Halton. However, the Council have undertaken further work in relation to their OAN, alongside other authorities from the Liverpool City Region producing a Strategic Housing and Employment Land Market Assessment (SHELMA).
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01254 Matthew Good Home Builders Federation Ltd 01254/2/009 QUEST 7.4 Housing	Housing 7.3 - Other forms of housing The HBF is supportive of providing housing for specialist needs, it must however be recognised that this may be neither feasible nor desirable on many sites due to issues such as location, need for services, topography and viability. Therefore a blanket requirement for all sites to provide for such accommodation is unlikely to be practical nor deliverable. Therefore Option 7.3A is not supported.	The Council acknowledges the HBFs support of housing for specialist needs, and has taken into consideration the other points raised in policy RD5: Specialist Housing.
01254 Matthew Good Home Builders Federation Ltd 01254/2/010 QUEST 7.4 Housing	Housing 7.3 - Other forms of housing Option 7.3B refers to the requirement for a proportion of dwellings on sites to meet the Lifetime Homes standard. The Council will be aware that the Lifetime Homes standard is no longer applicable following the Government's Housing Standards review. Lifetime Homes have now been replaced by the optional Building Regulations accessibility standards. These standards can be introduced via a plan but only where there is specific evidence to justify their inclusion. The evidence base and method of introduction is set out within the PPG section upon 'Housing - Optional Technical Standards' and include consideration of need and viability. The HBF is unaware that the Council can provide the necessary evidence at this stage and as such this option is not recommended.	The Council have noted that the Lifetime Homes standard is no longer applicable and will not continue to refer to it. The Council have also noted the HBF's comments in relation to the evidence for specialist housing and this has been taken into consideration.
01254 Matthew Good Home Builders Federation Ltd 01254/2/011 QUEST 7.4 Housing	Housing 7.3 - Other forms of housing The HBF favour Options 7.3C 'Allocate sites for specialist accommodation' and Option 7.3D 'Identify criteria for sites that could be used for specialist accommodation'. These options, which should be applied flexibly, would ensure that specialist accommodation is provided in the correct location specific to the needs of the accommodation.	This comment is acknowledged, and has been taken into consideration when drafting policy RD5: Specialist Housing.
01254 Matthew Good Home Builders Federation Ltd 01254/2/012 QUEST 7.5 Housing	The policy areas generally appear appropriate. In formulating policies it is important that the Council provides a positive framework which enables appropriate development to occur and does not place undue constraints and burdens upon the development industry.	This comment is noted and has been taken into consideration in the drafting of policies for the Local Plan.

01254 Matthew Good Home Builders Federation Ltd 01254/2/013 QUEST 7.6 Housing	The HBF consider that all the policies will require either amending or complete replacement to ensure they are up to date and to reflect new evidence upon issues such as the housing requirement, viability, additional sites and to ensure that the plan reflects the wider Liverpool City Region growth agenda.	This comment is noted.
01254 Matthew Good Home Builders Federation Ltd 01254/2/014 QUEST 7.7 Housing	No, the HBF does not advocate any further policy requirements at this stage.	This comment is noted.
01254 Matthew Good Home Builders Federation Ltd 01254/2/015 QUEST 7.8 Housing	The scope is generally considered appropriate, although we will reserve judgement until detailed policy wording is provided. In terms of the policy H3 Affordable Housing this will also need to consider the implication of starter homes.	This comment is noted. Further text will be added in relation to Starter Homes as and when there is sufficient detail available from Government.
01254 Matthew Good Home Builders Federation Ltd 01254/2/016 QUEST 11.3 Sustainable Development in Halton	The HBF support the inclusion of policies SD1 'Green Belt Release Allocations' and SD3 'Safeguarded Land'. The NPPF, paragraphs 83 to 85, provides the mechanism for releasing Green Belt through the Local Plan process and requires local authorities to demonstrate exceptional circumstances. Providing other avenues of delivery have been explored the need to meet the housing needs of an area has been accepted to meet exceptional circumstances in other Local Plan examinations. In this regard, and taking account of the wider growth ambitions of the city region, as well as the need to increase the levels of house building within Halton the HBF agrees that Green Belt release should be considered through the plan.	This comment is acknowledged.

01254 Matthew Good Home Builders Federation Ltd 01254/2/017 QUEST 11.3 Sustainable Development in Halton	The HBF support the inclusion of policies SD1 'Green Belt Release Allocations' and SD3 'Safeguarded Land'. In terms of safeguarded land the HBF supports the principle of its identification as this should provide certainty over the Green Belt boundaries beyond the plan period. This is consistent with the NPPF, paragraph 85. The NPPF, paragraph 85, identifies that where necessary Local Plans should provide safeguarded land to meet longer term development needs stretching 'well beyond the plan period' and that local authorities should satisfy themselves that Green Belt boundaries 'will not need to be altered at the end of the development plan period'. Furthermore NPPF paragraph 83 is clear that once established Green Belt boundaries should be '...capable of enduring beyond the plan period'. There is therefore an in-built presumption within the NPPF that where it is justified to amend Green Belt boundaries this should be undertaken as part of the local plan process and that the new Green Belt boundaries should not require alteration at the end of the plan period. Whilst there have been numerous interpretations of the above requirements the HBF consider that a 15 year time horizon post plan period should be adopted. This would accord with the NPPF preference for Local Plans to be drawn up over a 15 year time horizon (paragraph 157).	The Council have had regard to the intended permanence of the Green Belt in the long term in line with the NPPF, so that the Green Belt is capable of enduring beyond the plan period.
01254 Matthew Good Home Builders Federation Ltd 01254/2/018 QUEST 11.5 Sustainable Development in Halton	No, the HBF does not advocate any further policy areas at this stage.	This comment is noted.

01254 Matthew Good Home Builders Federation Ltd 01254/2/019 QUEST 11.6 Sustainable Development in Halton	The scope of the policies generally appear appropriate, although we will reserve judgement until detailed policy wording is provided. Policy SD4 'Design of Development' refers to low carbon and the use of renewables. The Council will be aware that following the Government's Housing Standards Review the energy requirements for new dwellings was identified as a matter solely for the Building Regulations. The Council will, therefore, be unable to require housing developments to incorporate renewable energy installations.	These comments are noted, and those in relation to renewable and low carbon technologies have been taken into consideration when drafting the wording of the policy GR5: Renewable and Low Carbon Energy.
01254 Matthew Good Home Builders Federation Ltd 01254/2/020 QUEST 13.1 Site Allocations	The suggested presentation appears appropriate. The HBF support the indication that development capacities and phasing will be indicative only. This is important to ensure sustainable sites are not constrained from coming forward earlier in the plan process than initially envisaged. This is important as such assumptions do not take account of the changing nature of housing needs and demand but also site specific viability and constraints which may not be fully understood until detailed pre-application work is undertaken. It is suggested that the phasing element include a trajectory for site completion, which is kept under review. It is noted that the Council intends to undertake engagement with the relevant landowner, promoter or developer, wherever possible. This is supported and it is encouraged that the information from this engagement is used to inform the assumptions within the plan.	These comments are noted.
01294 Mr Quentin Keohane 01294/1/001 QUEST 13.2 Site Allocations	Request to have land considered for future allocation and development.	This site is noted. Sites submitted for development will be considered through the Site Assessment process.

01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/001 QUEST 2.2 Policy Framework	Yes. We agree that the Delivery and Allocations Local Plan ('DALP') should proceed. The Liverpool City Devolution Agreement devolves powers over strategic planning, including the responsibility to create a Single Statutory City Region Strategic Framework, which will support the delivery of strategic employment and housing sites. However, there is no timetable for the production of the document and the Devolution Agreement is clear (paragraph 22a) that the Liverpool City Region Strategic Framework approach 'must not delay the development of local plans'.	The City Region Statutory Plan Road Map states that the timescale for the production of the Strategic Spatial Framework is scheduled for years 2018-2020 The Devolution Agreement suggests that Authorities within the city Region commit to delivering local plans by early 2017. Halton Council adopted its Local Plan, the Core Strategy, in April 2013. Building on this strategic policy framework, the Revised Core Strategy Policies and Delivery and Allocations Local Plan document will be informed by the emerging City Region Strategic Framework and evidence base.
01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/002 QUEST 2.2 Policy Framework	It is noted that the Devolution Agreement suggests that Authorities within the City Region commit to delivering local plans by early 2017 however the DALP is not expected to be adopted until 2018. Accordingly, we consider that the relationship between the DALP and City Region Strategic Framework should be clearly articulated.	It is agreed that the Devolution Agreement suggests that Authorities within the city Region commit to delivering local plans by early 2017. Halton Council adopted its Local Plan, the Core Strategy, in April 2013. Building on this strategic policy framework, the Revised Core Strategy Policies and Delivery and Allocations Local Plan document will be informed by the City Region Strategic Framework and evidence base.
01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/003 QUEST 2.2 Policy framework	We question whether there is a need or obligation to step away from the settled housing requirement in the adopted Core Strategy, where this is to be considered within the Liverpool City Region Strategic Framework. It should be noted that the annual housing requirement within the Core Strategy is in excess of the annual Objectively Assessed Need claimed by the Council.	The Core Strategy housing requirement was not based upon objectively assessed need (OAN). To be compliant with NPPF the Revised Core Strategy Policies and Delivery and Allocations Local Plan document will need to address this issue. The Mid Mersey SHMA and a Liverpool City Region Strategic Housing and Employment Land Market Assessment (SHELMA) was part of the evidence used to inform Halton's housing requirement.

01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/004 QUEST 4.1 Evidence Base	Yes. An up to date assessment of the Objectively Assessed Needs for employment land in the Borough needs to be undertaken, in accordance with the requirements of the National Planning Policy Framework ('NPPF') and the National Planning Practice Guidance ('NPPG').	Comments noted.
01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/005 QUEST 4.1 Evidence Base	We also reserve the right to interrogate and comment separately on the Mid Mersey Strategic Housing Market Assessment ('SHMA') (January 2016).	Comments noted.
01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/006 QUEST 4.1 Evidence Base	Whilst it is important to consider housing and employment land requirements with an up-to-date SHMA and economic development needs assessment, we question whether there is a need, or obligation for the DALP to step away from the settled requirements in the adopted Core Strategy, particularly if these will be re-considered as part of the Liverpool City Region Strategic Framework. The relationship between the SHMA and the Liverpool City Region Strategic Housing and Employment Land Market Assessment should be clearly articulated.	Halton Council adopted its Local Plan, the Core Strategy, in April 2013. Building on this strategic policy framework, the Revised Core Strategy Policies and Delivery and Allocations Local Plan document will be informed by the City Region Strategic Framework and evidence base. The Council are content with the evidence and methodology used within the Mid-Mersey and feel that it provides an appropriate OAN for Halton. However, the Council have undertaken further work in relation to their OAN, alongside other authorities from the Liverpool City Region producing a Strategic Housing and Employment Land Market Assessment (SHELMA). Both of these documents have contributed to the evidence Halton have used to inform Policy CS(R)1: Halton's Spatial Strategy and Policy CS(R)3: Housing Supply and Locational Priorities.

01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/007 QUEST 4.1 Evidence Base	We support the preparation of the Widnes and Hale Green Belt Study, but seek clarification of the timescale for the completion of the work. Notcutts have previously submitted representations to the Green Belt Study Methodology (2013) and Site Assessments consultation (2015) documents and consider that the land at and around the Rivendell Garden Centre and within Notcutts' ownership is suitable for Green Belt release.	The Council consider the Green Belt Study as an iterative document that may continue to evolve as sites are considered in the Halton Local Plan and as and when more information becomes available. The document will continue to be produced and made available alongside the production of the Local Plan. The Widnes and Hale Green Belt Study is an evidence based document and as such, has and will continue to inform the Local Plan. Relevant stages have been made available on the Council website (www.halton.gov.uk).
01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/008 QUEST 4.1 Evidence Base	A number of the other evidence base documents are also potentially out of date, for example the Halton Strategic Flood Risk Assessments (2007 and 2011) and the Halton Open Space Study (2006). Halton Borough Council ('HBC') should review the evidence base to ensure that it is adequate and up to date for the purposes of NPPF, paragraph 158.	The Council will continue to review and update its evidence base. The Council has worked with other authorities in the Liverpool City Region to produce a Strategic Housing and Employment Land Market Assessment (SHELMA), and a Retail Study for Halton has also been produced. Other elements of the evidence base will be reviewed as needed during the production of the Halton Local Plan.
01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/009 CHAP 4 Evidence Base	A number of the other evidence base documents are also potentially out of date, for example the Halton Strategic Flood Risk Assessments (2007 and 2011) and the Halton Open Space Study (2006). Halton Borough Council ('HBC') should review the evidence base to ensure that it is adequate and up to date for the purposes of NPPF, paragraph 158.	In accordance with paragraph 158 of the National Planning Policy Framework (NPPF) adequate, up-to-date and relevant evidence has and will inform the Local Plan.
01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/010 CHAP 4 Evidence Base	The DALP should recognise that the North Widnes and Hale Green Belt Study will reconsider the landscape character of the Borough and therefore the weight to be attached to the Halton Landscape Character Assessment (2009) is limited.	The Halton Landscape Character Assessment is an evidence base document and has informed the Widnes and Hale Green Belt study. In accordance with NPPF it is felt that this evidence is proportionate.

01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/011 QUEST 5.1 Vision and Objectives	The challenges set out in the Core Strategy still appear to be broadly relevant. However, these will need to be reviewed in light of the up to date evidence base. Further challenges are: - o To identify sufficient development land, including sites within the Green Belt in order to provide for development needs beyond the DALP period. - o To provide housing in the locations where it is needed, such as Widnes.	Comments noted.
01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/012 QUEST 5.2 Vision and Objectives	The Core Strategy relates to the period 2010 and 2028 and we question whether there is a need, or obligation to step away from the settled housing requirements. Re-assessing the Objectively Assessed Need for housing and establishing a new housing requirement could have implications for other elements of the DALP, in particular relating to the plan period, the amount of employment growth / land, the Green Belt, safeguarded land, and the distribution of development and this would need to be clearly explained and reflected in the vision.	The Core Strategy housing requirement was not based upon objectively assessed need (OAN). To be compliant with NPPF the Revised Core Strategy Policies and Delivery and Allocations Local Plan will need to address this issue. It is agreed that establishing a new housing requirement will have implications for other elements of the Revised Core Strategy Policies and Delivery and Allocations document and this has been addressed in the preparation of the Halton Local Plan and its evidence base.
01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/013 QUEST 5.2 Vision and Objectives	The vision should emphasise that housing will be provided in the locations where it is needed, such as Widnes.	Due to the limited nature of changes requested the Council are not intending to amend the Vision or Strategic Objectives of the adopted Local Plan Core Strategy.
01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/014 QUEST 5.3 Vision and Objectives	The vision should emphasise that housing will be provided in the locations where it is needed, such as Widnes.	The Council have taken a number of elements in to consideration when determining the appropriate housing figure for the Borough (including the split between Runcorn and Widnes), this will include (but not be limited to) the objectively assessed need identified in the evidence provided for both the Liverpool City Region and the Mid-Mersey, the results of this consultation and the policies of the NPPF. Further detail can be found in Policy CS(R)1: Halton's Spatial Strategy and Policy CS(R)3: Housing Supply and Locational Priorities.

01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/015 QUEST 6.1 Supporting Halton's Economy	We agree that there is a need to provide an appropriate supply of employment land, balance the supply of new homes with the creation of job opportunities and provide homes to attract and retain skilled workers.	Comments noted.
01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/016 QUEST 6.1 Supporting Halton's Economy	We consider that the land at and around the Rivendell Garden Centre and within Notcutts' ownership represents an excellent opportunity for a residential led mixed use development, which would consolidate and secure the existing commercial use (and the associated employment which it provides) on the site and make a positive contribution towards meeting housing and employment/retail needs within the Local Plan period.	Comments noted. Where considered appropriate as part of the Green Belt Study or for non-Green Belt sites, sites that have been submitted for development have been considered through the Site Assessment process. Proposed sites to be released from the Green Belt are set out in Policy GB TEMP: Green Belt Release Allocations, as well as within other appropriate allocation policies (Policy ED1: Employment Allocations and RD1: Residential Development Allocations), and can be located on the proposed Policies Map.
01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/017 QUEST 6.2 Supporting Halton's Economy	A challenge will be to provide the right homes in the right locations to attract and retain skilled workers.	Comments noted.

01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/018 QUEST 6.4 Supporting Halton's Economy	We consider that an up to date assessment of the Objectively Assessed Needs for employment land in the Borough needs to be undertaken in accordance with the requirements of the NPPF and the NPPG. Whilst it is important to consider housing and employment land requirements with an up-to-date SHMA and economic development needs assessment, we question whether there is a need, or obligation for the DALP to step away from the settled requirements in the adopted Core Strategy, particularly if these will be re-considered as part of the Liverpool City Region Strategic Framework.	In accordance with the requirements of NPPF and NPPG the OAN for employment land in Halton will be based upon an up to date evidence base. The Core Strategy housing requirement was not based upon objectively assessed need (OAN). To be compliant with NPPF the Local Plan will need to address this issue.
01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/019 QUEST 6.4 Supporting Halton's Economy	We consider that any new employment land requirement should take account of the potential increasing demand arising from opportunities in the area, including the Growth of SuperPort, Liverpool John Lennon Airport, HS2 and HS3.	Comments noted.
01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/020 QUEST 6.6 Supporting Halton's Economy	We question whether there is a need or obligation to step away from the settled employment land requirement in the adopted Core Strategy, particularly if this will be re-considered as part of the Liverpool City Region Strategic Framework. If deemed appropriate, we consider that any new employment land requirement should take account of the potential increasing demand arising from opportunities in the area, including the Growth of SuperPort, Liverpool John Lennon Airport, HS2 and HS3.	In accordance with the requirements of NPPF and NPPG the OAN for employment land in Halton will be based upon an up to date evidence base. The Core Strategy employment requirement was not based upon objectively assessed need (OAN). To be compliant with NPPF the Local Plan will need to address this issue.
01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/021 QUEST 6.6 Supporting Halton's Economy	The relationship between the proposed policies and the Core Strategy/UDP policies (including the colouring within the scope of policies tables) is not entirely clear.	This table will be revisited to ensure the relationship between the proposed policies and the Core Strategy / UDP policies is clarified.

01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/022 QUEST 6.7 Supporting Halton's Economy	The DALP should include a Policy which supports the continued operation and expansion of existing businesses within the Borough, such as the Rivendell Garden Centre.	The Council has taken this comment into consideration when drafting the Economic Development section.
01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/023 QUEST 7.1 Housing	We agree that a key issue is to determine the right amount and type of new homes needed to meet housing requirements and how they are provided across the sub areas of Runcorn and Widnes. The Objectively Assessed Need ('OAN') now claimed by the Council (466 dwellings per annum) seems low, when compared to the Core Strategy requirement of 552 dwellings per annum and we reserve the right to interrogate and comment separately on the SHMA. We question whether there is a need or obligation to step away from the settled housing requirement in the adopted Core Strategy, in particular where this exceeds the OAN and is to be re-considered within the Liverpool City Region Strategic Framework. Notwithstanding the above, we support the 53:47 housing need split in favour of Widnes identified in Table 93, Appendix A of the SHMA. This compares to the 43:57 split in favour of Runcorn currently within Policy CS3 of the Core Strategy. We note that 56% of the dwellings completed in Halton since 2010 have been in Widnes, which reinforces the point. 53% of 466 results in a need for 247 dwellings per annum in Widnes, which is higher than the 237.2 dwellings per annum currently required in the Core Strategy.	The Core Strategy housing requirement was not based upon objectively assessed need (OAN). To be compliant with NPPF the Local Plan will need to address this issue. The comments in relation to the housing split are noted. The Council have taken a number of elements in to consideration when determining the appropriate housing figure for the Borough, and the identified sub-areas. This has included the objectively assessed need identified in the evidence provided for both the Liverpool City Region and the Mid-Mersey, the results of this consultation, and the policies of the NPPF. Further detail can be found in Policy CS(R)1: Halton's Spatial Strategy and Policy CS(R)3: Housing Supply and Locational Priorities.

01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/024 QUEST 7.1 Housing	The DALP plan period is not clear (see response to Question 5.2 above). However, if the OAN derived need in Widnes is applied from the SHMA 2014 base date, the housing need and supply position in Widnes over the Core Strategy period would (applying the Council's evidence base) be as follows: -Housing Requirement (2010-2014) = $237.2 \times 4 = 948.8$ -Housing Requirement (2014-2028) = $247 \times 14 = 3,458$ -Housing Requirement (2010-2028) = 4,406.8 -Completions 2010 – 2015= 905 -Identified Supply (at 2015)=2309 -Surplus/Deficit=-1192.8 It is clear that if the OAN derived need in Widnes is applied from the SHMA 2014 base date, additional sites would continue to be needed to address the shortfall in Widnes in the Local Plan period and that this would still represent exceptional circumstances requiring a review of the Green Belt around Widnes and Hale as part of the DALP. The deficit may even be higher, as no allowance has been made for non-delivery or slippage of sites without planning permission and we have not interrogated the SHMA, OAN or SHLAA. We also consider that the Council should plan for higher levels housing than the OAN now claimed to take account of growth aspirations (if setting a new requirement).	The Local Plan will cover the period 2014 to 2037. The SHMA and SHELMA have contributed to the evidence base for the production of the Local Plan alongside other documents. The SHMA and SHELMA have taken into account any suppression in household formation and therefore it is not considered appropriate or necessary to include any surplus or deficit from the previous plan period. However, it is agreed that there are exceptional circumstances requiring the need for a review of the Green Belt in Widnes.
01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/025 QUEST 7.1 Housing	We note and support the recognition within the DALP Scoping Document that there are limited remaining development opportunities on previously developed land and that a greater proportion of future development will need to take place on greenfield sites, including sites in the Green Belt.	Comment noted.

01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/026 QUEST 7.1 Housing	We consider that the land at and around the Rivendell Garden Centre and within Notcutts' ownership (much of which is previously developed) is suitable for Green Belt release and can deliver a robust development site which will have no detrimental impact on the remaining Green Belt. We consider that the site, which is wholly within Notcutts' ownership, represents an excellent opportunity for a residential led mixed use development, which would consolidate and improve the existing commercial use and make a positive contribution towards meeting housing needs within the Local Plan period. Separate representations have also been submitted to the Widnes and Hale Green Belt Study and Call For Sites.	Comments noted.
01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/027 QUEST 7.2 Housing	In the event that the DALP establishes a new housing land requirement, we consider this should take into account economic growth aspirations (including an up to date assessment of the Objectively Assessed Needs for employment land).	Comments noted.

01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/028 QUEST 7.4 Housing	The Objectively Assessed Need (OAN) now claimed by the Council (466 dwellings per annum) seems low, when compared to the Core Strategy requirement of 552 dwellings per annum and we reserve the right to interrogate and comment separately on the SHMA. We question whether there is a need or obligation to step away from the settled housing requirement in the adopted Core Strategy, in particular where this exceeds the OAN and is to be reconsidered within the Liverpool City Region Strategic Framework. Notwithstanding the above, we recognise that the OAN claimed by the Council is 'policy off' and that a new housing requirement will need to take into account wider factors, such as the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints and the Council's economic growth aspirations.	The Core Strategy housing requirement was not based upon objectively assessed need (OAN). To be compliant with NPPF the Local Plan will need to address this issue. The Council considers that an appropriate level of homes and employment opportunities to meet the OAN and create a sustainable balance for the Borough are set out in Policy CS(R)1: Halton's Spatial Strategy. The Council have taken a number of elements in to consideration when determining the appropriate housing figure for the Borough, and the identified sub-areas. This has included the objectively assessed need identified in the evidence provided for both the Liverpool City Region and the Mid-Mersey, the results of this consultation and the policies of the NPPF. Further information can be found in the Justification for Policy CS(R)3: Housing Supply and Locational Priorities.
01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/029 QUEST 7.4 Housing	If setting a new housing requirement, we consider that DALP should plan for higher levels of job growth than the baseline economic forecast is suggesting, it should also seek to increase levels of affordability and provide flexibility for a range of house types. Consequently, in the event that the DALP establishes a new housing requirement we consider that the Council should plan for higher levels of housing than the OAN, which is now claimed.	The Council considers that an appropriate level of homes and employment opportunities to meet the OAN and create a sustainable balance for the Borough are set out in Policy CS(R)1: Halton's Spatial Strategy. The Council have taken a number of elements in to consideration when determining the appropriate housing figure for the Borough, and the identified sub-areas. This has included the objectively assessed need identified in the evidence provided for both the Liverpool City Region and the Mid-Mersey, the results of this consultation and the policies of the NPPF. Further information can be found in the Justification for Policy CS(R)3: Housing Supply and Locational Priorities.

01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/030 QUEST 7.4 Housing	We support the 53:47 housing need split in favour of Widnes identified in Table 93, Appendix A of the SHMA and consider that this split should be used as the basis for calculating and setting out the number of dwellings to be provided in the Widnes sub area as part of a revised housing requirement.	Comments noted. The SHMA makes reference to potential distribution of demand based on demographic need, which it applies to the recommended 'Trend Based Demographic Projections' figure of 410 p.a. As the Economic led housing need figure is higher (466 d.p.a. based on 4,952 jobs growth) and the SHELMA provides alternate figures again, additional work on the distribution of economic growth and impact on housing OAN has been undertaken. The Council have taken a number of elements in to consideration when determining the appropriate housing figure for the Borough, and the identified sub-areas. This has included the objectively assessed need identified in the evidence provided for both the Liverpool City Region and the Mid-Mersey, the results of this consultation and the policies of the NPPF. Further information can be found in the Justification for Policy CS(R)3: Housing Supply and Locational Priorities.
01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/031 QUEST 7.4 Housing	We do not consider that the requirements for specialist accommodation should be overly prescriptive. Need and viability will be important considerations.	These comments are noted, and have been taken into consideration in policy RD5: Specialist Housing.

01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/032 QUEST 7.8 Housing	The relationship between the proposed policies and the Core Strategy/UDP policies (including the colouring within the scope of policies tables) is not entirely clear. We question whether there is a need or obligation to step away from the settled housing land requirement in the adopted Core Strategy. We reserve the right to comment when detailed policy wording is proposed by Halton Borough Council.	Appendix C of the DALP Scoping Document (2016) set out the relationship between the proposed policies and the policies of the Core Strategy and UDP. This has been updated and clarified within Appendix C of Revised Core Strategy Policies and Delivery and Allocations document. The Core Strategy housing requirement was not based upon objectively assessed need (OAN). To be compliant with NPPF the Local Plan has had to address this issue.
01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/033 QUEST 7.8 Housing	With reference to Policy H2, we consider that the land at and around the Rivendell Garden Centre and within Notcutts' ownership should be allocated for residential led mixed use development, which would consolidate and improve the existing retail/commercial use and make a positive contribution towards meeting housing needs within the Local Plan period.	This site is noted. Where considered appropriate as part of the Green Belt Study or for non-Green Belt sites, sites that have been submitted for development have been considered through the Site Assessment process. Proposed sites to be released from the Green Belt are set out in Policy GB TEMP: Green Belt Release Allocations, as well as within other appropriate allocation policies (e.g. Policy ED1: Employment Allocations and RD1: Residential Development Allocations), and can be located on the proposed Policies Map.
01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/034 QUEST 9.7 Town District and Local Centres	The DALP should include a Policy which supports the continued operation and expansion of existing retail uses within the Borough, such as the Rivendell Garden Centre. Rivendell Garden Centre employs 36 full time equivalent staff and is owned and operated by Notcutts. The Garden Centre has performed reasonably well in recent years, despite challenging economic conditions; however the buildings and external sales spaces at the site are becoming increasingly inefficient and unsuitable to meet modern retail needs. Notcutts has identified a need for significant investment in the Garden Centre in order for the business to meet modern requirements and remain competitive.	This comment is noted. The owner's aspirations for this Green Belt site are noted. Sites submitted for development within the current Green Belt will be considered through the Green Belt Study and Site Assessment process. The appropriate policy treatment for out-of-centre retail will be considered in light of wider national and local retail objectives.

01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/035 QUEST 9.7 Town, District and Local Centres	We consider that the land at and around the Rivendell Garden Centre and within Notcutts' ownership (whilst in an out of centre location) should be specifically allocated for residential led mixed use development, which would consolidate and improve the existing retail/commercial use and make a positive contribution towards meeting housing needs within the Local Plan period.	This site is noted. Sites submitted for development within the current Green Belt will be considered through the Green Belt Study and Site Assessment process. Proposals for out-of-centre retail will be considered in light of the retail policies.
01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/036 QUEST 11.1 Sustainable Development in Halton	We support the recognition that the DALP will need to identify sufficient development land, including through Green Belt Release to provide for beyond the current plan period.	This support is noted.
01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/037 QUEST 11.1 Sustainable Development in Halton	We agree that one of the challenges for this Local Plan will be to alter the Green Belt boundary to provide the land needed to provide sufficient development to meet the housing requirements and to ensure that sufficient appropriate Safeguarded Land is provided for future development needs. See response to Question 7.1 above.	This comment is noted. No action is required.

01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/038 QUEST 11.1 Sustainable Development in Halton	We consider that the land at and around the Rivendell Garden Centre and within Notcutts' ownership is suitable for Green Belt release and can deliver a robust development site which will have no detrimental impact on the remaining Green Belt. We consider that the site represents an excellent opportunity for a residential led mixed use development, which would consolidate and improve the existing commercial use and make a positive contribution towards meeting housing needs within the Local Plan period. Separate representations have also been submitted to the Widnes and Hale Green Belt Study and Call For Sites.	This site is noted. Where considered appropriate as part of the Green Belt Study or for non-Green Belt sites, sites that have been submitted for development have been considered through the Site Assessment process. Proposed sites to be released from the Green Belt are set out in Policy GB TEMP: Green Belt Release Allocations, as well as within other appropriate allocation policies (e.g. Policy ED1: Employment Allocations and RD1: Residential Development Allocations), and can be located on the proposed Policies Map.
01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/039 QUEST 11.1 Sustainable Development in Halton	We note that following the devolution of Strategic Planning powers to the Liverpool City Region Combined Authority (new Mayor), the DALP will need to be mindful of the emerging more structured, strategic, approach to land requirements and Green Belt across the City Region. We seek clarification of the relationship between the DALP and City Region Strategic Framework and consider that this should be clearly articulated. We do not consider that the Green Belt review and the allocation/development of sites which are suitable for release to meet the development needs of Widnes and Hale should be delayed any further given the time which has already passed, since the adoption of the Core Strategy in 2013.	The Council concur, and indeed the Devolution Agreement stipulates that work on individual Local Plans should not be delayed pending the production of the Liverpool City Region Strategic Framework. The Council will also endeavour to ensure that the Local Plan provides appropriate mechanisms and flexibility to take the Liverpool City Region Strategic Framework into account.
01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/040 QUEST 11.5 Sustainable Development in Halton	The DALP should include a Policy which supports the continued operation and expansion of existing businesses within the Borough, such as the Rivendell Garden Centre.	The Council have taken this comment into consideration when drafting the Economic Development section. However, there is need to have regard to the sites Green Belt status and the treatment of out-of-centre developments in the retail policies.

01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/041 QUEST 11.6 Sustainable Development in Halton	With reference to Policy SD1, we support release of sites from the Green Belt to meet development needs. However, we question whether a specific policy is needed for Green Belt Allocations and suggest that these should form part of the general site allocations policy described in Section 13 of the Consultation document. Notwithstanding the above, we consider that the land at and around the Rivendell Garden Centre and within Notcutts' ownership is suitable for Green Belt release and can deliver a robust development site which will have no detrimental impact on the remaining Green Belt. We consider that the site represents an excellent opportunity for a residential led mixed use development allocation, which would consolidate and improve the existing commercial use and make a positive contribution towards meeting housing needs within the Local Plan period. Separate representations have also been submitted to the Widnes and Hale Green Belt Study and Call For Sites.	When the final document is published it will not include Green Belt allocations as these sites will no longer be within the Green Belt. This policy is to aid the consultation process and to help identify to members of the public which sites are to be released from the Green Belt. This site is noted. Where considered appropriate as part of the Green Belt Study or for non-Green Belt sites, sites that have been submitted for development have been considered through the Site Assessment process. Proposed sites to be released from the Green Belt are set out in Policy GB TEMP: Green Belt Release Allocations, as well as within other appropriate allocation policies (e.g. Policy ED1: Employment Allocations and RD1: Residential Development Allocations), and can be located on the proposed Policies Map.
01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/042 QUEST 13.1 Site Allocations	We consider that this approach seems appropriate.	Comments noted.
01305 Mr Frazer Sandwith Jones Lang LaSalle (on behalf of Notcutts) 01305/1/043 QUEST 13.2 Site Allocations	We consider that the land at and around the Rivendell Garden Centre and within Notcutts' ownership is suitable for Green Belt release and can deliver a robust development site which will have no detrimental impact on the remaining Green Belt. We consider that the site represents an excellent opportunity for a residential led mixed use development allocation, which would consolidate and improve the existing commercial use and make a positive contribution towards meeting housing needs within the Local Plan period.	Comments noted.

01321 Brian O'Connor Nathaniel Lichfield & Partners (on behalf of Taylor Wimpey) 01321/3/001 QUEST 2.1 Policy Framework	Taylor Wimpey considers that the Housing and Planning Bill 2015-16 needs to be taken into account together with the anticipated changes to the Framework (which are subject to consultation) in the DALP. This is particularly the case with the introduction of 'starter homes' as appropriate form of affordable housing and the statutory requirement to deliver starter homes.	Although text has been included within Policy CS(R)13: Affordable Housing in relation to 'starter homes' it is possible that this and other policies may need to be adjusted as and when there is further detail as to how the scheme will work. This will also apply to other anticipated changes following the enactment of the Housing and Planning Act.
01321 Brian O'Connor Nathaniel Lichfield & Partners (on behalf of Taylor Wimpey) 01321/3/002 QUEST q2.2 Policy	Taylor Wimpey is of the opinion that the DALP should proceed without delay. The Halton Core Strategy Local Plan was adopted in April 2013. Policy CS6: Green Belt of the Core Strategy Local Plan identified a need for a partial Green Belt review during the early part of the plan period to ensure a sufficient ongoing supply of deliverable development land to meet the requirements of the Borough's separate communities. Taylor Wimpey considers that Green Belt release is needed as soon as possible to ensure housing delivery meets the identified housing need. There is no certainty as to when the Liverpool City Region Strategic Framework [LSRF] will be produced. The complexity of issues that the LSRF will deal with means that it may take longer than expected to come forward. The Chapel Lane site should be removed from the Green Belt and allocated for housing now.	The Council agree with Taylor Wimpey that it would not be appropriate to wait indefinitely for the production of the Liverpool City Region Strategic Framework.
01321 Brian O'Connor Nathaniel Lichfield & Partners (on behalf of Taylor Wimpey) 01321/3/003 QUEST Q3.1 Policy	The Halton Core Strategy EiP concluded that there was not enough development land in Widnes and Hale to meet future development needs (to 2028 and beyond), and that this represented 'exceptional circumstances' requiring a review of the Green Belt around Widnes and Hale. We understand that the Green Belt Study is at the site assessment consultation stage. Accordingly, Taylor Wimpey considers that the Green Belt Study should be prepared alongside the DALP.	This comment is noted. The Council consider the Green Belt Study as an iterative document that may continue to evolve as sites are considered in the Halton Local Plan and as and when more information becomes available. The document will continue to be produced and made available alongside the production of the Local Plan.

01321 Brian O'Connor Nathaniel Lichfield & Partners (on behalf of Taylor Wimpey) 01321/3/004 QUEST q4.I Policy	The Council's range of evidence base documents is acceptable. However, Taylor Wimpey considers that it contain some documents which need to be updated, including the Joint Employment Land and Premises Study, the Halton Retail and Leisure Study, the Halton Landscape Character Assessment, the Halton Strategic Flood Risk Assessment and the Mersey Gateway Regeneration Strategy, which we consider to be all out-of-date. Taylor Wimpey has considerable concerns about the Mid Mersey Strategic Housing Market Assessment. In particular, Taylor Wimpey has concerns in relation to the methodology and a number of assumptions that render it unsound and inconsistent with national guidance. Amongst other shortcomings, the SHMA underplays market signal pressures within the three Mid-Mersey authorities, does not make an appropriate uplift to help address the affordability issues, and uses unrealistic employment activity rates, therefore under-estimating the level of net in-migration that would be required to sustain the local economy at the desired level. Furthermore, the evidence to suggest that the three Mid-Mersey authorities form a self-contained Housing Market Area [HMA] is not clear or robust. This stage, we consider that there are no other background evidence documents that should be produced to support the preparation of the DALP. However, the evidence base documents need to be updated regularly as new information becomes available.	The Council will continue to review and update its evidence base. It is currently working with other authorities in the Liverpool City Region on a Strategic Housing and Employment Land Market Assessment (SHELMA), it is also currently undertaking a new Retail Study for Halton. Other elements of the evidence base will be reviewed as needed during the production of the Halton Local Plan.
01321 Brian O'Connor Nathaniel Lichfield & Partners (on behalf of Taylor Wimpey) 01321/3/005 QUEST Q5.I Policy Evidence	Taylor Wimpey agrees that Halton's challenges taken from the Core Strategy Local Plan remain relevant for the DALP. The challenge most relevant to Taylor Wimpey is the challenge to "deliver and secure a balanced housing offer which is appropriate to local markets and ultimately supports the Borough's economic growth". Taylor Wimpey consider that their site at Chapel Lane can ensure the delivery of high quality family homes including the policy compliant provision of affordable housing to help re-balance the housing offer in Halton.	This comment is noted.

01321 Brian O'Connor Nathaniel Lichfield & Partners (on behalf of Taylor Wimpey) 01321/3/006 QUEST Q5.2 Policy Evidence	Taylor Wimpey agrees that Halton's spatial vision to 2028 taken from the Core Strategy Local Plan remains relevant for the DALP. However, if HBC are to review housing requirements, then Halton's spatial vision should be extended to a minimum of 15 years from the adoption year of the DALP, to allow for proper planned development in line with the Framework [§157], so as to take account of longer term requirements.	This comment is noted. The Local Plan will cover the period to 2037.
01321 Brian O'Connor Nathaniel Lichfield & Partners (on behalf of Taylor Wimpey)s 01321/3/007 PARA Q5.3 Policy Evidence	Taylor Wimpey agrees that Halton's strategic objectives taken from the Core Strategy Local Plan remain relevant for the DALP. The two strategic objectives most relevant to Taylor Wimpey are: Strategic Objective 1: Create and support attractive, accessible and adaptable residential neighbourhoods where people want to live; and Strategic Objective 2: Provide good quality, affordable accommodation and a wide mix of housing types to create balanced communities. Taylor Wimpey are committed to meeting these objectives and would be able to meet these objectives in developing the Chapel Lane site for residential development.	This comment is acknowledged.

01321 Brian O'Connor Nathaniel Lichfield & Partners (on behalf of Taylor Wimpey) 01321/3/008 QUEST Q6.1 Policy Evidence	Taylor Wimpey agrees with the identified issues and challenges that should be addressed in relation to the Economy in the DALP. However, it is imperative that the supply of new homes and the creation of new job opportunities are aligned, to ensure sustainable development within the Borough. The delivery of housing in the Borough will have significant direct and indirect benefits to the economy. High quality homes that people want to live in will attract professional people to the area, which in turn, will improve the economy and lead to greater levels of spending in Halton Borough.	Taylor Wimpey's comment in relation to the issues and challenges is noted. The Council considers that an appropriate level of homes and employment opportunities to meet the OAN and create a sustainable balance for the Borough are set out in Policy CS(R)1: Halton's Spatial Strategy. The Council have taken a number of elements in to consideration when determining the appropriate housing figure for the Borough, and the identified sub-areas. This has included the objectively assessed need identified in the evidence provided for both the Liverpool City Region and the Mid-Mersey, the results of this consultation and the policies of the NPPF.
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01321 Brian O'Connor Nathaniel Lichfield & Partners (on behalf of Taylor Wimpey)s 01321/3/009 QUEST Q6.4 Policy Evidence	Taylor Wimpey is of the opinion that Options 6.1A, 6.1D & 6.1E are the most appropriate options to follow within the DALP. Option 6.1A is based on economic forecasts and is certainly an appropriate option when considering the amount of employment land provided. Option 6.1D seeks to provide more employment land than suggested by economic forecasts or past take up rates and seeks to increase job opportunities within the Borough. Option 6.1E seeks to provide an increased level of employment land for higher skilled jobs. Paragraph 6.10 of the DALP identifies an issue and challenge to attract more skilled workers to live and work in the Borough and this option seeks to respond to this challenge. These three Options are required to improve the economy in the Borough and the housing requirement should align to ensure the Council does not promote unsustainable modes of transport. In fact, the Council refers to an aspiration to create an environment where employers want to invest and create jobs and thus, promote economic development. The alternative options of 6.1B and 6.1C relate to past take up rates of employment land. Taylor Wimpey is of the opinion that past take up rates are not relevant to the current and future requirement for employment land.	This comment is noted. The Council considers that an appropriate level of homes and employment opportunities to meet the OAN and create a sustainable balance for the Borough are set out in Policy CS(R)1: Halton's Spatial Strategy. The Council have worked, and will continue to work with the LEP and other City Region Authorities in relation to detailed economic forecasting. This evidence has been fed into the LCR SHELMA, and used to produce both the housing and employment figures. These figures are set out in the Revised Core Strategy Policies and Delivery and Allocations and have been used as part of the evidence to support the housing and employment requirements set out in policy CS(R)1: Halton's Spatial Strategy and CS(R)4: Employment Land Supply.
01321 Brian O'Connor Nathaniel Lichfield & Partners (on behalf of Taylor Wimpey) 01321/3/010 QUEST Q6.5 Policy Evidence	Taylor Wimpey considers that Halton UDP Policies E1, E2, E3 & E4: are relevant to Halton's Economy. Halton UDP Policy E5: New Industrial and Commercial Development is a saved policy that also relates to Halton's economy and this policy is not included in the local planning authority's list of policies relevant to Halton's economy. This policy sets out the requirements to which new industrial and commercial development including extensions to existing premises will be expected to comply with. This includes a requirement to ensure that industrial and commercial development is compatible with existing and proposed surrounding uses, in particular, by providing landscape buffer zones between the industrial and commercial development and adjoining residential areas.	Policy E5 of the UDP is to be replaced by proposed Policy ED2: Employment Development, it is considered that the elements highlighted by Taylor Wimpey are covered by this Policy.

01321 Brian O'Connor Nathaniel Lichfield & Partners (on behalf of Taylor Wimpey) 01321/3/011 QUEST Q7.1 Policy Evidence	A number of issues and challenges are referred to in relation to housing including the need to respond to the changing population structure including an ageing population, to tackle deprivation and ensure growth and to provide a greater proportion of future development on greenfield sites, including sites in the Green Belt. Taylor Wimpey is of the opinion that these are the issues and challenges that should be addressed in relation to housing in the DALP. However, Taylor Wimpey understands that there is currently an over representation of terraced properties and a need for smaller social / rented properties and more high quality family housing, as set out in Paragraph 7.1 of the DALP. Accordingly, Green Belt land should be released and appropriate strategic sites should be allocated. The Chapel Lane site would provide an ideal opportunity to deliver a mix of housing types and help meet the need for smaller social /rented properties and family housing in a high quality and sustainable development. One identified issue refers to an assertion that increasing the density of housing development would mean less greenfield land would be required to meet the Borough's housing needs. However, the development of sites for residential development must be tested on their suitability and viability to ensure deliverability and there is already an over representation of terraced properties. Furthermore, higher densities, especially on the edge of settlements can have an impact on the character of settlements and the surrounding landscape. Taylor Wimpey notes that the Borough has an ageing population and the development of the Chapel Lane Site would increase local labour supply and provide family housing suitable for working people. Accordingly, there needs to be an alignment between housing and economic challenges. There is currently an over-representation of terraced houses in the Borough when compared to the regional and national average and there is a significant and identified demand for family homes. However, the level of affordable housing must be site specific and appropriate to ensure that residential developments are viable. It is envisaged that the Chapel Lane site will be able to deliver a significant proportion of affordable homes to meet the identified need.	These comments are noted. The Council has sought to allocate appropriate sites for residential development through the production of the Local Plan. The proposed allocations are set out in Policies GB Temp proposed green belt allocations and RDI: Residential Development Allocations and can be located on the proposed Policies Map. The Council will also seek to work with the key stakeholders in relation to these sites to ensure that they provide an appropriate density of development and type and tenure of dwellings.
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01321 Brian O'Connor Nathaniel Lichfield & Partners (on behalf of Taylor Wimpey) 01321/3/012 QUEST 7.4 Housing	Taylor Wimpey does not agree with the identified Objectively Assessed Need (OAN) of 466 dwellings each year with a proposed distribution north and south of the river. In the first instance, Taylor Wimpey is of the opinion that HBC should calculate a robust OAN for the Borough and use it as a starting point for setting a housing land requirement that fully supports the economic and social aspirations for the Borough. Taylor Wimpey considers that the OAN needs to be corrected and an allowance made to increase the working age and take account of worsening market signals.	The Council considers that an appropriate level of homes and employment opportunities to meet the OAN and create a sustainable balance for the Borough are set out in Policy CS(R)1: Halton's Spatial Strategy. The Council are content with the evidence and methodology used within the Mid-Mersey and feel that it provides an appropriate OAN for Halton. However, the Council have undertaken further work in relation to their OAN, alongside other authorities from the Liverpool City Region producing a Strategic Housing and Employment Land Market Assessment (SHELMA).
01321 Brian O'Connor Nathaniel Lichfield & Partners (on behalf of Taylor Wimpey)s 01321/3/013 QUEST 7.4 Housing	Taylor Wimpey broadly agrees with Option 7.1B, however Taylor Wimpey is of the opinion that the OAN needs to be corrected in the first instance. This option seeks to allow for an increase in working age people in the Borough (an issue and challenge identified in Paragraph 7.10 of the DALP) and to increase the levels of affordability in the Borough. Once the OAN has been corrected, Taylor Wimpey believes that Option 7.1B should be used as the delivery option of dwellings in the Borough.	The Council considers that an appropriate level of homes and employment opportunities to meet the OAN and create a sustainable balance for the Borough are set out in Policy CS(R)1: Halton's Spatial Strategy. The Council have taken a number of elements in to consideration when determining the appropriate housing figure for the Borough, and the identified sub-areas. This has included the objectively assessed need identified in the evidence provided for both the Liverpool City Region and the Mid-Mersey, the results of this consultation and the policies of the NPPF.

01321 Brian O'Connor Nathaniel Lichfield & Partners (on behalf of Taylor Wimpey) 01321/3/014 QUEST 7.4 Housing	Taylor Wimpey certainly does not consider that the options to use the OAN (Option 7.1A) or to have a housing requirement lower than the OAN (Option 7.1C) are options that would proactively assist in the delivery of dwellings in the Borough. Option 7.1C is not appropriate as it will not meet the housing need or re-balance the housing supply. As set out in §83 of the Framework, if there are exceptional circumstances, then Green Belt boundaries should be altered through the preparation of the Local Plan and HBC quote this in §9.4 of their Halton Core Strategy Local Plan. Taylor Wimpey argues that there are exceptional circumstances for releasing the Chapel Lane site, a site which would deliver the mix of houses sought in the borough and help reduce the shortfall in the need for residential development.	The Council considers that an appropriate level of homes and employment opportunities to meet the OAN and create a sustainable balance for the Borough are set out in Policy CS(R)1: Halton's Spatial Strategy. The Council have taken a number of elements in to consideration when determining the appropriate housing figure for the Borough, and the identified sub-areas. This has included the objectively assessed need identified in the evidence provided for both the Liverpool City Region and the Mid-Mersey, the results of this consultation and the policies of the NPPF. Proposed sites to be released from the Green Belt are set out in Policy GB TEMP: Green Belt Release Allocations. As well as within ED1 Employment Allocations and RD1; Residential development Allocations.
01321 Brian O'Connor Nathaniel Lichfield & Partners (on behalf of Taylor Wimpey) 01321/3/015 QUEST 7.4 Housing	Taylor Wimpey does not believe that the Council should retain the Core Strategy requirement (Option 7.1D) and that the number of dwellings to be delivered should be calculated on the basis of or above a revised and robustly calculated OAN.	The Council considers that an appropriate level of homes and employment opportunities to meet the OAN and create a sustainable balance for the Borough are set out in Policy CS(R)1: Halton's Spatial Strategy. The Council have taken a number of elements in to consideration when determining the appropriate housing figure for the Borough, and the identified sub-areas. This has included the objectively assessed need identified in the evidence provided for both the Liverpool City Region and the Mid-Mersey, the results of this consultation and the policies of the NPPF.

01321 Brian O'Connor Nathaniel Lichfield & Partners (on behalf of Taylor Wimpey) 01321/3/016 QUEST 7.5 Housing	The scope of policies section relates to all the housing policies set out in the Halton UDP. It should be noted that Policy H2 has been replaced with Core Strategy Policy CS3. Furthermore, Policy H5 has been replaced with Core Strategy Policy CS14. Accordingly, these original policies have already been deleted and should not be consideration in relation to current housing policy. Only the saved polices of the Halton UDP that refer to housing and the housing policies within the Core Strategy Local Plan (2013) should be included.	The status of UDP policies H2 or H5 are correctly listed in Appendix D (page 101) of the DALP Scoping Document and neither deleted policy has been included in the list of policies to be reviewed / replaced in table in Section 7.
01321 Brian O'Connor Nathaniel Lichfield & Partners (on behalf of Taylor Wimpey) 01321/3/017 QUEST 7.6 Housing	Taylor Wimpey considers that the identified policies should be replaced in line with any replacement and up-to-date evidence base documents.	This comment is noted.
01321 Brian O'Connor Nathaniel Lichfield & Partners (on behalf of Taylor Wimpey) 01321/3/018 QUEST 7.7 Housing	Taylor Wimpey considers that there are no other policies in relation to housing that we consider should be incorporated within the DALP, but reserves the right to comment on this in the future.	This comment is noted.

01321 Brian O'Connor Nathaniel Lichfield & Partners (on behalf of Taylor Wimpey) 01321/3/019 QUEST 11.1 Sustainable Development	A large number of issues and challenges are referred to in relation to sustainable development. These include the need for the DALP to identify sufficient development land including through Green Belt Release, to provide for beyond the current plan period. Other issues and challenges include the need to encourage development that achieves high standards of sustainable design and construction and for development to put in place mitigation and adaptation measures to deal with the threat of climate change. Taylor Wimpey agrees that these are the issues and challenges that should be addressed in relation to Sustainable Development in the DALP. However, as set out in the DALP [§11.16] it will be necessary to identify sufficient development land, including through Green Belt Release to provide for beyond the current plan period. Taylor Wimpey is of the opinion that the Chapel Lane site should be released now, to help meet the identified housing need in the Borough.	These comments are noted. Proposed sites to be released from the Green Belt are set out in Policy GB TEMP: Green Belt Release Allocations. As well as within the other appropriate allocations policies.
01321 Brian O'Connor Nathaniel Lichfield & Partners (on behalf of Taylor Wimpey) 01321/3/020 QUEST 13.1 Site Allocations	Taylor Wimpey is of the opinion that the suggested presentation of the DALP is appropriate. However, the viability of developments is a key issue that must be considered. Furthermore, it is important that the local planning authority do not exaggerate the capacity of sites to be brought forward for residential development. Sites to be brought forward must be realistic and viable and the capacity of sites should take account of this. This should be done via discussions with housebuilders and developers as a way of informing the plan appropriately. Taylor Wimpey is of the opinion that to meet the identified housing need, Green Belt land, such as the Chapel Lane site, must be released without delay.	The proposed residential allocations are set out Policy RD1: Residential Development Allocations and can be located on the proposed Policies Map. The Council will also seek to work with the key stakeholders in relation to these sites to ensure that they provide an appropriate density of development and appropriate number, type and tenure of home. The Local Plan will be subject to whole plan Viability Assessment, including an appraisal of the proposed sites.

01321 Brian O'Connor Nathaniel Lichfield & Partners (on behalf of Taylor Wimpey) 01321/3/021 QUEST 13.2 Site Allocations	Taylor Wimpey considers that the Chapel Lane site in Widnes is a Green Belt site that should be released and allocated for residential development in the DALP. We have submitted a Call for Sites form and covering letter (dated 24 February 2016) in conjunction with these representations. This demonstrates that this site no longer fulfils the purpose of the Green Belt and is under control of a developer and is deliverable in the short term. This would help to rebalance the Council's identified housing supply issues. The land at Chapel Lane presents an ideal opportunity to create a sustainable, distinctive and attractive development, meeting the housing needs of the community. Taylor Wimpey is committed to meeting the aspirations of the Council, delivering high quality family homes to address the needs of the local community. It is envisaged that the Chapel Lane site could deliver approximately 450 high quality family homes with associated landscaping and open space. Taylor Wimpey requests that consideration is given to the inclusion of the land at Chapel Lane, Widnes within the DALP as a site which has the potential to meet housing development need on the basis that: 1 The site no longer fulfils its Green Belt purpose and should be removed and allocated for housing development or safeguarded for future development needs. We note that the site could come forward immediately, within the first five years of the plan if necessary. 2 Residential development on this site would constitute sustainable development and perform a positive economic, social and environmental role aligning with the principles of the Framework. 3 There are no technical constraints preventing the future development of the site.	This site is noted. Where considered appropriate as part of the Green Belt Study or for non-Green Belt sites, sites that have been submitted for development have been considered through the Site Assessment process. Proposed sites to be released from the Green Belt are set out in Policy GB TEMP: Green Belt Release Allocations, as well as within other appropriate allocation policies (e.g. Policy ED1: Employment Allocations and RD1: Residential Development Allocations), and can be located on the proposed Policies Map.
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01326 Alison Ross 01326/4/001 ALL All DALP	There has been a failure to effectively notify the owner / occupiers of Norton Crossing Cottage WA71QY and previous to 2014 consultation of these plans and proposals. Should Wharford Farm land be purchased as proposed, the freehold known as Norton Crossing Cottage and other ownership rights will affectively be 'landlocked' The owners of Norton Crossing Cottage do not agree to these proposals. I will now focus on this new revised plan. Thankfully this new revised plan includes our home but fails to include our access. This access has been used since the property was built around 1700 -1800 and is legal and equitable in nature. It represents the only access to my home, without which you affectively land lock us. Whilst other properties surrounding the area may be affected to a small degree, our property will be grossly and disproportionately affected.	This comment is noted.
01341 Edward Harvey CBRE Ltd (on behalf of United Utilities) 01341/2/001 ALL All DALP	When preparing the Development Plan and future policies, 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. It may be necessary to co-ordinate the delivery of development with the delivery of infrastructure in some circumstances.	This comment is acknowledged. The Council will continue to work closely with United Utilities during the preparation of the Halton Local Plan, including the identification of areas where there is existing infrastructure capacity.
01341 Edward Harvey CBRE Ltd (on behalf of United Utilities) 01341/2/002 ALL All DALP	United Utilities wishes to highlight that we will seek to work closely with the Council during the Local Plan process to develop a coordinated approach to delivering sustainable growth in sustainable locations which are accessible to local services and infrastructure. United Utilities will continue to work with the Council to identify any infrastructure issues and most appropriately manage the impact of development on our infrastructure during the preparation of the Local Plan.	This comment is acknowledged. The Council will continue to work closely with United Utilities.

01341 Edward Harvey CBRE Ltd (on behalf of United Utilities) 01341/2/003 CHAP 13 Site Allocations	We understand the Council will be required to consider the allocation of a large number of development sites as part of the emerging Delivery and Allocations Local Plan. The Council is aware from past discussions with colleagues that a fuller understanding of the impact on water and wastewater infrastructure can only be achieved once more details are known, such as the timescales for development, the approach to surface water management and the chosen points of connection. Once more information is available with respect to specific development sites, which is often only at planning application stage, we will be able to better understand the potential impacts of development on infrastructure and, as a result, it may be necessary to coordinate the delivery of development with the timing for delivery of infrastructure improvements. We suggest that this should be included as a detailed development management policy and can advise on an appropriate wording. Please note that United Utilities seeks to undertake further discussions with the Council on technical matters relating to site-specific development, such as site drainage and the Surface Water Hierarchy, once the Council identifies its preferred site allocations. In your selection criteria, we would encourage the Council to consider the availability of alternatives to the public sewerage system for surface water discharges. For example, sites with land drains or near to watercourses are a more sustainable alternative to the public sewer.	The Council are disappointed that Untied Utilities are apparently seeking to defer detailed appraisal of the impact of major developments to the 'planning application' stage. This would leave a unacceptable question marks over the deliverability / timing of key components of the Local Plan. The Council will continue to work closely with United Utilities through the preparation of the Halton Local Plan, and together with site promoters will seek to secure sufficient information to allow United Utilities to undertake detailed assessments in relation to technical matters relating to site specific infrastructure when we are at the appropriate stage in the production of this document.
01341 Edward Harvey CBRE Ltd (on behalf of United Utilities) 01341/2/004 QUEST 8.2 Connectivity and Infrastructure	United Utilities welcomes the inclusion of Paragraph 8.12, which recognises that: "One of the key issues that will need to be considered is the impact of new development on existing infrastructure, especially roads, water supply, sewerage and energy".	This comment is noted. No action is required.

01341 Edward Harvey CBRE Ltd (on behalf of United Utilities) 01341/2/005 QUEST 10.2 Halton's Environment	In regards to other issues and challenges which should be considered in relation to Halton's environment, United Utilities requests that the LPA robustly considers the availability of alternatives for disposing of surface water to the public sewer for sites which are proposed to be developed. This should be a consideration of policy and the subsequent application process. Applicants should be required by policy to thoroughly investigate the surface water hierarchy on sites identified for development in the plan period (and beyond). It is most appropriate to establish key site specific drainage principles as part of policy where it is possible to identify the most sustainable form of approach to surface water drainage. Any surface water discharge should be attenuated to the most appropriate level having regard to existing site conditions, including an allowance for climate change and this should be reflected in policy.	The Council have sought to include appropriate wording within Policy HE9: Water Management and Flood Risk.
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01341 Edward Harvey CBRE Ltd (on behalf of United Utilities) 01341/2/006 QUEST 10.4 Halton's Environment	Surface Water Management Whilst United Utilities welcomes the inclusion of a specific policy (Ref: HE10) in regards to 'Water Management and Flood Risk', we recommend including a specific policy on surface water management. We suggest including the following draft policy in the 'Preferred Options' version of the document: <i>"Surface water should be discharged in the following order of priority:</i> <i>1. An adequate soakaway or some other form of infiltration system.</i> <i>2. An attenuated discharge to watercourse.</i> <i>3. An attenuated discharge to public surface water sewer.</i> <i>4. An attenuated discharge to public combined sewer.</i> <i>Applicants wishing to discharge to public sewer will need to submit clear evidence demonstrating why alternative options are not available. Approved development proposals will be expected to be supplemented by appropriate maintenance and management regimes for surface water drainage schemes. On large sites it may be necessary to ensure the drainage proposals are part of a wider, holistic strategy which coordinates the approach to drainage between phases, between developers, and over a number of years of construction.</i> <i>On greenfield sites, applicants will be expected to demonstrate that the current natural discharge solution from a site is at least mimicked. On previously developed land, applicants should target a reduction of surface water discharge.</i> <i>Landscaping proposals should consider what contribution the landscaping of a site can make to reducing surface water discharge. This can include hard and soft landscaping such as permeable surfaces.</i> <i>The treatment and processing of surface water is not a sustainable solution. Surface water should be managed at source and not transferred. Every option should be investigated before discharging surface water into a public sewerage network. A discharge to groundwater or watercourse may require the consent of the Environment Agency."</i> It should be a clear requirement of allocated and windfall sites that all new development should manage surface water in the most sustainable, effective and appropriate way. We request that developers / applicants clearly demonstrate with evidence, how they have applied the drainage hierarchy set out above, as part of the Council's consideration of potential	The Council have sought to include appropriate wording within Policy HE9: Water Management and Flood Risk.
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01341 Edward Harvey CBRE Ltd (on behalf of United Utilities) 01341/2/007 QUEST 10.4 Halton's Environment	In some instances it may be necessary to coordinate infrastructure improvements with the delivery of development. In accordance with paragraphs 156 and 162 of the National Planning Policy Framework (NPPF), we recommend the following detailed policy is included as part of the Local Plan in relation to infrastructure provision: "Once more details are known on development sites, for example the approach to surface water management and proposed connection points to the foul sewer network, it may be necessary to coordinate the delivery of development with the timing for the delivery of infrastructure improvements. At the larger development sites, it may be necessary to ensure that the delivery of development is guided by strategies for infrastructure which ensure coordination between phases of development over lengthy time periods and by numerous developers. The Council will support the principle of investment in infrastructure to respond to development and environmental needs. Infrastructure is key to the delivery of sustainable development and economic growth and meeting the development needs of the Borough." With regards large sites, United Utilities wishes to highlight the challenge that is often presented by fragmented ownership. Whilst masterplans often aspire to secure the delivery of development in a coordinated and holistic manner, this is often a major challenge in practice. We encourage the council to carefully consider the deliverability issues and practical issues associated with sites in fragmented ownership. On such sites, we would strongly encourage the council to challenge the site promoters to present a clear site wide infrastructure strategy. On larger sites, it should be clearly demonstrated there is a formal mechanism which will ensure the landowners will work together to deliver a coordinated approach to infrastructure over the whole site. This is a key element of delivering sustainable development and is in the best interests of good planning. We strongly recommend this is addressed in advance of allocating specific sites.	The Council will add further text as suggested in relation to the need to coordinate infrastructure improvements and the delivery of development. The Council will consider how it can work with sites with multiple land owners in order to provide a site wide infrastructure strategy.
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01341 Edward Harvey CBRE Ltd (on behalf of United Utilities) 01341/2/008 QUEST 10.4 Halton's Environment	Health and Well-Being United Utilities recommends the following text is included as part of the Council's proposed development management policies in relation to health, well-being and residential amenity: <i>"The proposed development of sensitive uses (such as residential) adjacent to existing sources of pollution (e.g. noise, odour, traffic etc.) must demonstrate through the submission of appropriate impact assessments that there would be no detrimental impact on future residential amenity."</i> In the site selection process, we feel it is important to highlight that new development sites are more appropriately located away from existing operational sources of pollution such as noise and odour.	Policy GR2: Amenity has been drafted taking these comments into consideration.
01362 John Moran Health and Safety Executive (HSE) 01362/2/001 CHAP Appendix A NPPF Requirements	The National Planning Policy Framework (NPPF Para. 172) requires that planning policies should be based on up-to-date information on the location of major accident hazards and on the mitigation of the consequences of major accidents. In our previous representation we recommended that NPPF Para. 172 could be included in your DALP. We acknowledge that the current DALP consultation document now references Para. 172 (Appendix A - Pg.93) as a NPPF requirement relevant to the Local Plan and the corresponding policy that the requirement would be covered in (HE9: Major Accident Hazards).	This comment is noted.
01362 John Moran Health and Safety Executive (HSE) 01362/2/002 CHAP 10 Halton's Environment	The National Planning Policy Framework (NPPF Para. 172) requires that planning policies should be based on up-to-date information on the location of major accident hazards and on the mitigation of the consequences of major accidents. In our previous representation we recommended that NPPF Para. 172 could be included in your DALP. We acknowledge that the current DALP consultation document now references Para. 172 (Appendix A - Pg.93) as a NPPF requirement relevant to the Local Plan and the corresponding policy that the requirement would be covered in (HE9: Major Accident Hazards).	This comment is noted.

01362 John Moran Health and Safety Executive (HSE) 01362/2/003 ALL All DALP	Regulation 10(1)(b) of the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended requires that in local plans and supplementary planning documents, regard be had for the objectives of preventing major accidents and limiting the consequences of such accidents for human health and the environment by pursuing those objectives through the controls described in Article 13 of Council Directive 2012/18/EU (Seveso III). Regulation 10(c)(i) requires that regard also be had to the need, in the long term, to maintain appropriate safety distances between establishments and residential areas, buildings and areas of public use, recreational areas, and, as far as possible, major transport routes.	This comment is acknowledged. However, following the review of Policy CS23 as part of the DALP Scoping consultation, it has been considered appropriate to retain the existing Policy CS23 of the Core Strategy.
01362 John Moran Health and Safety Executive (HSE) 01362/2/004 QUEST 10.6 Halton's Environment	It is noted that Policy HE9 (Pg.57) refers to the Potential use of HSE planning advise (sic) web application. The HSE strongly recommends the use of the Web App for all relevant developments within HSE consultation zones. As stated in our earlier representation (Paras 18-19), HSE advises Halton Borough Council to give primacy to the advice obtained, which should not be overridden without the most careful consideration. The use of the Web App is also the most efficient and cost effective way to access HSE's advice.	This comment is acknowledged. However, following the review of Policy CS23 as part of the DALP Scoping consultation, it has been considered appropriate to retain the existing Policy CS23 of the Core Strategy.
01362 John Moran Health and Safety Executive (HSE) 01362/2/005 CHAP 13 Site Allocations	In our earlier representation we concluded that there was the potential for proposed land allocations as described in your DALP evidence documents to encroach on HSE consultation zones. For example, the Strategic Housing Land Availability Assessment 2012 (SHLAA 2012) identified potential encroachments on the consultation zones of Ineos Chlor Limited, The Heath, Runcorn (HSE Ref. No: H0391). It was noted in the SHLAA 2012 Site Schedule that the sites within HSE consultation zones were acknowledged.	This comment is noted.

01362 John Moran Health and Safety Executive (HSE) 01362/2/006 CHAP 13 Site Allocations	This representation repeats the recommendation that as your plan develops, the most accurate and efficient way for HSE to make a representation in advance of a planning application, and particularly where multiple land allocations are proposed, is to analyse the Geographical Information System (GIS) data for all the potential allocations, e.g. the GIS allocation data for any relevant DALP evidence document that is taken forward including the findings of your Call for Sites consultation. Detailed analysis and the associated advice on the extent of encroachment remains outside the scope of this response. It is recommended therefore that at the Draft Local Plan consultation stage that you supply HSE with GIS data for the proposed land allocations.	This comment is acknowledged. The Council will continue to work closely with HSE through the preparation of the Halton Local Plan, and in particular will provide relevant GIS information when we are at the appropriate stage in the production of this document.
01362 John Moran Health and Safety Executive (HSE) 01362/2/007 CHAP 13 Site Allocations	The compatibility issues raised by developing housing within inner, middle and outer zones are summarised below. Housing Allocations Inner Zone - Housing is not compatible with development in an inner zone. HSE would normally Advise Against such development. The only exception is developments of 1 or 2 dwelling units where there is a minimal increase in people at risk. Middle Zone - A middle zone is compatible with housing developments up to and including 30 dwelling units and at a density of no more than 40 per hectare. Outer Zone - Housing is compatible with development in an outer zone including larger developments of more than 30 dwelling units and high-density developments of more than 40 dwelling units per hectare.	This comment is noted, and has been taken into consideration during the preparation of the Local Plan.

01362 John Moran Health and Safety Executive (HSE) 01362/2/008 CHAP 13 Site Allocations	The compatibility issues raised by developing workplaces within inner, middle and outer zones are summarised below. Workplace Allocations Inner Zone - Workplaces (predominantly non-retail) providing for less than 100 occupants in each building and less than 3 occupied storeys are compatible with an inner zone. Retail developments with less than 250m² total floor space are compatible with an inner zone. Note: Workplaces (predominantly non-retail) providing for 100 or more occupants in any building or 3 or more occupied storeys in height are compatible with an inner zone where the development is at the major hazard site itself and will be under the control of the site operator. Middle Zone - A middle zone is compatible with workplaces (predominantly non-retail). Retail developments with total floor space up to 5000m² are compatible with a middle zone. Outer Zone - Workplaces (predominantly non-retail) are compatible with an outer zone. Workplaces (predominantly non-retail) specifically for people with disabilities (e.g. sheltered workshops) are only compatible with an outer zone. Retail developments with more than 5000m² total floor space are compatible with an outer zone. This is a general description of the compatibility for housing and workplaces. Detail of other development types, for example institutional accommodation and education, and their compatibility with consultations zones can be found in the section on Development Type Tables of HSE's Land Use Planning Methodology, which is available at: http://www.hse.gov.uk/landuseplanning/methodology.pdf	This comment is noted, and has been taken into consideration during the preparation of the Local Plan.
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01362 John Moran Health and Safety Executive (HSE) 01362/2/009 QUEST 10.6 Halton's Environment	HSE recommends that where there are major hazard establishments and MAHPs within the area of your local plan, that you mark the associated consultation zones on a map. This is an effective way to identify the development proposals that could encroach on consultation zones, and the extent of any encroachment that could occur. The proposal maps in site allocation development planning documents may be suitable for presenting this information although the use of web based interactive maps is becoming more common. We particularly recommend marking the zones associated with any MAHPs, and HSE advises that you contact the pipeline operator for up-to-date information on pipeline location, as pipelines can be diverted by operators from notified routes. Most incidents involving damage to buried pipelines occur because third parties are not aware of their presence.	This comment is noted, and will be taken into consideration during the preparation of the Local Plan.
01362 John Moran Health and Safety Executive (HSE) 01362/2/010 QUEST 10.6 Halton's Environment	The guidance in HSE's Land Use Planning Methodology, available at http://www.hse.gov.uk/landuseplanning/methodology.pdf will allow you to identify compatible development within any consultation zone in the area of your local plan. HSE recommends that you include in your plan an analysis of compatible development type within the consultation zones of major hazard establishments and MAHPs based on the methodology. The sections on Development Type Tables and the Decision Matrix are particularly relevant, and contain sufficient information to provide a general assessment of compatible development by use class within the zones.	This comment is noted, and will be taken into consideration during the preparation of the Local Plan.

01362 John Moran Health and Safety Executive (HSE) 01362/2/011 QUEST 10.6 Halton's Environment	Policy HE9 is relevant to Halton because of the presence of major accident hazard establishments and MAHPs and risks to people arising from that presence. Policy HE9 should be retained. The scope of HE9 is appropriate, but to ensure clarity HSE recommends that you give consideration to the following wording: <i>Risks to people arising from developments proposed within the consultation zones set by the Health and Safety Executive (HSE) around major accident hazard establishments and major accident hazard pipelines should be assessed using the advice obtained from HSE's Planning Advice Web App. The advice received from HSE must not be overridden without the most careful consideration.</i>	This comment is acknowledged. However, following the review of Policy CS23 as part of the DALP Scoping consultation, it has been considered appropriate to retain the existing Policy CS23 of the Core Strategy.
01365 Graham Trehella Cass Associates 01365/3/001 QUEST 11.2 Sustainable Development in Halton	It is important that policies in the DALP allow for some change in Hale Village in particular to assist in its future vitality as a sustainable community. This change will include development within the boundary of the inset village. We recognise that there will be a balance between meeting needs of new households, sustaining the village and its facilities and enhancing the particular characteristics of Hale Village. This balance can be addressed through an appropriately worded policy which relates to infill development or redevelopment at Hale Village. This is a policy that is needed and justified.	The Council have taken the future viability of Hale into consideration when drafting policies that will affect this area. It should be noted that the proposed sites to be released from the Green Belt are set out in Policy GB TEMP: Green Belt Release Allocations, as well as within other appropriate allocation policies (e.g. Policy ED1: Employment Allocations and RD1: Residential Development Allocations), and can be located on the proposed Policies Map. Whilst the areas in Hale, outside of the Green Belt, have been appropriately designated based on their current usage, for example as Primarily Residential Areas.

01365 Graham Trehwella Cass Associates 01365/3/002 QUEST 13.2 Site Allocations	There are opportunities at the centre of Hale Village for infill development which will bring much needed balance to the housing mix in the settlement. These opportunities should be identified in the DALP and allocated for housing. Site specific guidance could be given for each allocation so as to ensure that the right form of development is delivered and that any features of value are protected. This would represent positive planning and show support for this sustainable community. We propose an opportunity on a separate Call for Sites Form.	The proposed allocations are set out Policy RD1: Residential Development Allocations and can be located on the proposed Policies Map. All sites submitted for development have been considered through the Site Assessment process, this has included potential infill sites at Hale.
01394 Trevor Bostock INEOS ChlorVinyls Ltd 01394/2/001 ALL All DALP	In terms of the Delivery and Allocations of the Local Plan Consultation and Call for Sites, I can confirm that we are happy to continue to work with the Council, and that land is available within Inovyn ChlorVinyls Runcorn Site that could be made available for future redevelopment.	This comment is noted.

01405 John Coxon Emery Planning Partnership 01405/2/001 QUEST 13.2 Site Allocations	We write to submit two sites for consideration as residential allocations in the Halton Local Plan. They are two separate parcels of land located to the east and west of Norlands Lane. Both sites are under separate ownership, but are jointly promoted in these representations by our client, Osborne & Co Ltd. They are currently located within the Green Belt and are used for agricultural purposes. These representations are submitted on the basis that they form a part of a wider logical area of Green Belt which we consider should be deleted as part of a Green Belt Review. We enclose a map of the area we propose for deletion as part of these representations. 1. Land to the West of Norlands Lane The site is an open field in agricultural use, and is situated adjacent to the Norlands Park residential development to the north of the settlement of Lunts Heath. It is approximately 7.75ha in area, and would have capacity for up to 230 units, based on 30 dwellings per hectare. The site forms a part of the Green Belt to the north of Widnes. It is bounded to the east by Norlands Lane, to the north by agricultural fields, to the west by an access road which serves residential development; and to the south by residential development at Norlands Park. 2. Land east of Norlands Lane The site forms a part of the Green Belt to the north of Widnes. It is currently used as arable land. It is bounded to the west and north by Norlands Lane, to the east by agricultural land, and to the south by Wilmere Lane Playing Fields. The site has an area of approximately 14ha, and would have capacity for up to 420 units based on 30 units per hectare. In the alternative, should the sites not be allocated for residential development in the plan, they should be designated as safeguarded land to meet future development needs.	These sites are noted. Where considered appropriate as part of the Green Belt Study or for non-Green Belt sites, sites that have been submitted for development have been considered through the Site Assessment process. Proposed sites to be released from the Green Belt are set out in Policy GB TEMP: Green Belt Release Allocations, as well as within other appropriate allocation policies (e.g. Policy ED1: Employment Allocations and RD1: Residential Development Allocations), and can be located on the proposed Policies Map.
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01486 Helen Clarkson Bilfinger GVA 01486/2/001 QUEST 13.2 Site Allocations	Riverside College requests that 'Riverside College Runcorn Campus, Campus Drive, Runcorn' be considered in the Delivery and Allocations Local Plan (DALP) for residential development.	This site is noted. Sites submitted for development have been considered through the Site Assessment process. The proposed allocations are set out Policy RD1: Residential Development Allocations and can be located on the proposed Policies Map.
01490 John Bowles Porta Planning LLP 01490/1/001 QUEST 13.2 Site Allocations	Call for Sites submission for former BPI Stretchfilms Ltd factory and land at Warrington Road Widnes WA8 0SX. Proposed Use Residential with a potential capacity of circa 102 dwellings at 35dph.	This site is noted. Sites submitted for development have been considered through the Site Assessment process. The proposed allocations are set out Policy RD1: Residential Development Allocations and can be located on the proposed Policies Map.
01528 Ross Anthony The Theatres Trust 01528/1/001 QUEST 9.8 Town, District and Local Centres	Policy TC6 and Policy TC7 should be merged and the new policy should just refer to 'community facilities' - supported by the definition in the glossary. Or if retained separately, each section in the replacement policy TC6 should consistently refer to 'leisure and cultural facilities'. The importance of planning for culture and cultural facilities is emphasised in the NPPF by being included as a core planning principle (item 17). This is supported by guidance in item 70 of the NPPF which states that to deliver the social, recreational and cultural facilities and services that the community needs, planning policies and decisions should guard against unnecessary loss of valued facilities. Also to ensure that established facilities and services are retained and able to develop for the benefit of the community. Paragraph 156 also states local planning authorities should set out the strategic priorities in the Local Plan to deliver 'the provision of health, security, community and cultural infrastructure and other local facilities'.	These comments have been taken into consideration in the preparation of policies HC5: Commercial Leisure Developments and Cultural Facilities and HC6: Community Facilities.

01529 Doug Moir Cheshire Archaeology Planning Advisory Service 01529/1/001 ALL DALP	Given that there have been no changes to the way in which the historic environment is to be dealt with in national planning terms since the publication of National Planning Policy Framework, and the adoption of relevant Local Plan policies in the Halton Local Plan Core Strategy, the Archaeology Planning Advisory Service has no comments to make on the proposed review of the Core Strategy.	This comment is noted.
01530 Craig Barnes Barton Willmore on behalf of JPL 01530/1/001 QUEST 13.2 Site Allocation	Site to be considered for allocation at Cronton Lane, Widnes on behalf of our client Junction Property Ltd.	This site is noted. Where considered appropriate as part of the Green Belt Study or for non-Green Belt sites, sites that have been submitted for development have been considered through the Site Assessment process. Proposed sites to be released from the Green Belt are set out in Policy GB TEMP: Green Belt Release Allocations, as well as within other appropriate allocation policies (e.g. Policy ED1: Employment Allocations and RD1: Residential Development Allocations), and can be located on the proposed Policies Map.

01530 Craig Barnes Barton Willmore on behalf of JPL 01530/1/002 QUEST 2.2 Policy Framework	Our client is in agreement with the decision taken by the Council to continue with its work to prepare and adopt the DALP prior to the publication of the LSF. It is currently uncertain when exactly the LSF is likely to be in place to inform the preparation of Local Plans within the Liverpool City Region. The result would provide for a period unacceptable uncertainty for spatial planning and decision making Halton. This would unnecessarily prolong a period where judgements made by the Council are reflective of a strategy and evidence base which is accepted to be out-of-date. The failure of the Council to deliver a comprehensive and up-to-date development plan as soon as possible, could threaten and be counterproductive to, the delivery and achievement of existing Council objectives, wider economic goals and delivery of required housing land. To delay plan making further would fundamentally run counter to the aims of national Government. The Government has recently made clear of the urgent need for Local Planning Authorities to have in place an up-to-date Local Plan as soon as possible. This is further demonstrated by the Housing and Planning Bill which would allow Local Plans to be made centrally by the Government, where it has been found that a Local Planning Authority has not proceeded sufficiently with the adoption of an up-to-date plan.	The Council concur with Barton Wilmore on behalf of Junction Property Limited that it would not be appropriate to wait indefinitely for the production of the Liverpool City Region Strategic Framework, and that work should continue on the Halton Local Plan.
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01530 Craig Barnes Barton Willmore on behalf of JPL 01530/1/003 QUEST 2.2 Policy Framework	Whilst we are supportive of the Council's planned approach towards plan making in relation to the City Region, given the importance of the LSF and its supporting evidence, we consider that the DALP must have regard to any evidence produced on a City Regional basis which is published prior to the adoption of the DALP (scheduled for 2018). At the recent examination of the Sefton Local Plan, it was confirmed by Sefton Borough Council that the draft publication of the SHELMA report is due to be issued in September 2016. Given the very early stages of the DALP, we would expect the Council to consider this evidence in defining its preferred strategy. In order to ensure consistency with the LSF, the DALP must include a policy commitment to a full or partial review should existing policies prejudice the delivery of strategic requirements and/or policy of the LSF. This will ensure that the Local Plan in Halton is consistent with the strategic framework which may be adopted at a much later date than the DALP.	Where evidence is available to feed into the production of the Halton Local Plan the Council will take it in to consideration. The Council will also endeavour to ensure that the Local Plan provides appropriate mechanisms and flexibility to take the Liverpool City Region Strategic Framework into account.
01530 Craig Barnes Barton Willmore on behalf of JPL 01530/1/004 QUEST 4.1 Evidence Base	The following documents should be considered out-of-date and in need of review: - Halton Open Space Study (published in 2006); and - Halton Strategic Flood Risk Assessment (publication in 2007).	The Council is currently working on an Open Space Audit and Playing Pitch Strategy to support the production of the Local Plan.

01530 Craig Barnes Barton Willmore on behalf of JPL 01530/1/005 QUEST 4.1 Evidence Base	Whilst it is noted that viability evidence has been produced in support of the Council's recent consultation on the CIL, this evidence is insufficiently detailed to demonstrate that developer viability will be maintained alongside policy requirements. Paragraph 173 of the NPPF makes clear that in setting policy requirements, local planning authorities need to have sufficient regard to developer viability. To ensure compliance with the NPPF, there is a need for the Council to produce a thorough and up-to-date assessment of viability alongside its preparation of the DALP. This assessment will need to assess the potential impact of the implementation of proposed policy obligations upon developer viability demonstrate that developments remain viable.	The Council will consider the viability of the policies of the Local Plan, this may include the impact of CIL if it is considered appropriate to introduce CIL in the Borough or across the City Region.
01530 Craig Barnes Barton Willmore on behalf of JPL 01530/1/006 QUEST 4.1 Evidence Base	Work undertaken by the LEP should also feature as part of the evidence base for the DALP. Halton Borough Council is member of the Liverpool City Region LEP. As signatory, the Council should ensure that the development plan does not contradict or curtail the achievement of the economic objectives of the LEP. The development plan is an important mechanism for the delivery of LEP objectives.	Where appropriate evidence and information has been produced by the LEP, this will be taken into consideration in the production of the Local Plan.
01530 Craig Barnes Barton Willmore on behalf of JPL 01530/1/007 CHAP 5 Vision and Objectives	Our client is largely supportive of the issues, vision and objectives of the DALP identified by the Council. There are however a number of notable omissions. Given the evidently close relationship of Halton, with neighbouring authorities such as St Helens and Warrington, as well as the wider City Region, it is considered that there must be reference made to wider Regional objectives and challenges such the achievement of economic aspirations, and delivery of housing needs.	This comment is noted. The Council will continue to work closely with its neighbours through the Duty to Cooperate and with the wider City Region through the Combined Authority.

01530 Craig Barnes Barton Willmore on behalf of JPL 01530/1/008 CHAP 5 Vision and Objectives	Objective 2 of the DALP should be expended to specifically mention the need to provide sufficient housing supply and mix to support home ownership (particularly first time buyers), and attract economically active people, as well as families to the Borough. The achievement of this objective would help to counter the ageing of the population, labour shortages, and help maintain existing service levels. The Council should seek to distribute a greater amount of development to the north of the River Mersey in Widnes/Hale. Past and recent growth has been concentrated in Runcorn with little development north of the river. Whilst there are improvements currently being made to the connectivity between the two sides of the river with the development of the Mersey Gateway Crossing, development located in Widnes would have greater benefit of having stronger connections to Liverpool City Centre. New development in Widnes would benefit the town, its facilities and services. The Council has struggled to meet its housing targets for years. The release of more attractive Green Belt sites to the market in the north of the Borough will help provide a boost to housing land supply.	Due to the limited nature of changes requested the Council are not intending to amend the Strategic Objectives of the Plan. The comments in relation to the housing split are noted. The Council considers that an appropriate level of homes and employment opportunities to meet the OAN and create a sustainable balance for the Borough are set out in Policy CS(R)1: Halton's Spatial Strategy. The Council have taken a number of elements in to consideration when determining the appropriate housing figure for the Borough, and the identified sub-areas. This has included the objectively assessed need identified in the evidence provided for both the Liverpool City Region and the Mid-Mersey, the results of this consultation and the policies of the NPPF.
01530 Craig Barnes Barton Willmore on behalf of JPL 01530/1/009 CHAP 6 Supporting Halton's Economy	Our client is supportive of the recognition made by the Council within this section towards the LEP and the role that the DALP will have in delivering the objectives of the LEP. One absent point that would contribute to the delivery of LEP and Borough Economic objectives is the role provided by housing land supply to support this. This approach is consistent with Paragraph 158 of the NPPF, as well as PPG. In light of this, we expect the Council to provide for a planning strategy which seeks to support the delivery of economic growth objectives through the provision of sufficient housing land.	The Council have worked, and will continue to work with the LEP and other City Region Authorities in relation to detailed economic forecasting. This evidence has been fed into the LCR SHELMA, and used to produce both the housing and employment figures. These figures are set out in the Revised Core Strategy Policies and Delivery and Allocations and have been used as part of the evidence to support the housing and employment requirements set out in policy CS(R)1: Halton's Spatial Strategy.

01530 Craig Barnes Barton Willmore on behalf of JPL 01530/1/010 CHAP 6 Supporting Halton's Economy	The adoption of Option D (the allocation of employment land above projections and past take up) would provide the Council with the boost it is seeking to the local economy to support the achievement of LEP objectives. Past take up rates and economic forecasts would in part reflect trends observed as a result of the deep economic recession of 2008-2010 and slow recovery since. Caution should therefore be applied in the use of this data as a basis for the DALP. The adoption of an approach based on past take up/projections would not in the view of our client reflect positive planning, and could serve to undermine the achievement of the economic potential of the Borough.	The Council have worked, and will continue to work with the LEP and other City Region Authorities in relation to detailed economic forecasting. This evidence has been fed into the LCR SHELMA, and used to produce both the housing and employment figures. These figures are set out in the Revised Core Strategy Policies and Delivery and Allocations and have been used as part of the evidence to support the housing and employment requirements set out in policy CS(R)1: Halton's Spatial Strategy.
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01530 Craig Barnes Barton Willmore on behalf of JPL 01530/1/011 QUEST 6.4 Supporting Halton's Economy	There is justification for the adoption of all Options to secure the delivery of new employment as outlined within the consultation paper: - Delivery around key routes would be attractive to distributors; - The redevelopment of existing/previous employment areas could benefit existing businesses, and attract further employers to an area; - Expanding existing employment areas could build upon the success of an existing area, and develop specialisms within the workforce; - Greenfield sites attached to the larger settlements in the Borough could attract office type developments and/or more highly skilled/paid sectors. In light of this, it is considered that the Council should adopt a mixed strategy for the delivery of employment land. This approach will provide for a wider choice of sites, attracting wider uses, and heighten the prospect that desired economic growth can be delivered. The protection of existing employment sites is important to ensuring that the economic strategy and needs of the authority area can be achievable. However, the Council should be flexible to allowing the alternative use of allocated sites. Especially where vacant detracting sites can have an impact on a wider area. Subject to the consideration of other material planning issues and provided the proposed use is appropriately justified, the Council should allow sites to be used for other employment types, or other uses where it can be demonstrated by the applicant that there is no reasonable prospect of the site being used for its current/allocated use. The Council should clearly set out in policy its expectations of what it considers a "reasonable prospect" to be. There will need for the Council to adopt some flexibility in applying this policy, approaching each application on a case by case basis.	The Council have taken the points raised into consideration when considering the location of employment. The proposed allocations are set out Policy ED1: Employment Allocations and can be located on the proposed Policies Map. These are intended to provide a suitable choice of sites, attractive to a variety of uses and to allow for an appropriate level of economic growth. Proposed policy CS(R)4: Employment Land Supply provides a policy in relation to existing employment areas. This is intended to maintain employment land supply to meet the needs of the authority, whilst creating a flexible policy that allows sites to be used for other uses where it can be demonstrated by the applicant that there is no reasonable prospect of the site being used for its current or allocated use.
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01530 Craig Barnes Barton Willmore on behalf of JPL 01530/1/012 QUEST 6.8 Supporting Halton's Economy	Our client is largely in agreement with the proposed scope outlined for policy E1 to E4 of the consultation document. In defining "Primary Employment Areas" the Council must work with land promoters/developers/employers in defining the extent of these, and what this definition will mean in policy, in terms of flexibility of uses.	These comments are noted. The Council will continue to work with stakeholders throughout the preparation of the Local Plan.
01530 Craig Barnes Barton Willmore on behalf of JPL 01530/1/013 QUEST 6.8 Supporting Halton's Economy	We are supportive of the approach proposed by the Council through Point D of Policy E4 to allow housing on some employment sites to enable their delivery. This approach recognises that some economic uses in some areas of the Borough are not on their own viable, and housing could be provided to encourage their delivery. In order to promote the full delivery of required employment land, we believe that housing developments as an enabler on employment allocations should be permitted in wider locations than only within or adjacent to Town or District Centres. Such sites however should not be within identified Primary Employment Zones, and/or feature existing/proposed uses which are inappropriate and incompatible with residential use. Public amenity must be protected from sources of noise, air and light pollution, overlooking and loss of natural light in all cases. Neighbouring uses must not impact on the health and wellbeing of residents. Candidate sites must always be located within reasonable accessibility of existing services and facilities.	This comment has been taken into consideration when drafting PolicyED3: Complementary Services. Whilst Policy GR2: Amenity has been drafted in order to protect residential development from inappropriate and incompatible uses.
01530 Craig Barnes Barton Willmore on behalf of JPL 01530/1/014 QUEST 7.2 Housing	The Council need to provide some recognition to the need to tackle issues of affordability, home ownership and attraction of a skilled workforce. The housing strategy of Halton Borough Council must seek to address these if the Council is to be successful in overcoming its identified problem of an ageing population and to meet its economic aspirations.	Evidence base documents, such as the Mid-Mersey SHMA and LCR SHELMA consider these issues. These documents have been taken into consideration in preparing the Revised Core Strategy Policies and Delivery and Allocations Local Plan document.

01530 Craig Barnes Barton Willmore on behalf of JPL 01530/1/015 QUEST 7.4 Housing	We are not convinced that the findings of the SHMA reflect the true extent of the OAN of the HMA, and believe that a reassessment is necessary. From the information available we consider that it is likely that the OAN will be higher.	The Council considers that an appropriate level of homes and employment opportunities to meet the OAN and create a sustainable balance for the Borough are set out in Policy CS(R)1: Halton's Spatial Strategy. The Council are content with the evidence and methodology used within the Mid-Mersey and feel that it provides an appropriate OAN for Halton. However, the Council have undertaken further work in relation to their OAN, alongside other authorities from the Liverpool City Region producing a Strategic Housing and Employment Land Market Assessment (SHELMA).
01530 Craig Barnes Barton Willmore on behalf of JPL 01530/1/016 QUEST 7.4 Housing	Our client considers that at present, the Council should seek to form its housing strategy based on the delivery of Option B (to have a housing requirement higher than the OAN). The adoption of this approach would allow the Council to better prepare for the delivery of the true OAN of the Borough, which in our view is likely to be higher than currently outlined. This position should be reviewed by the Council once the SHELMA report is published in September 2016. As the report has been produced on a City Regional basis and will inform the LSF, the DALP must reflect this evidence in defining its housing requirement to ensure that the Plan is supported by a robust evidence base and meets the Duty to Cooperate.	The Council considers that an appropriate level of homes and employment opportunities to meet the OAN and create a sustainable balance for the Borough are set out in Policy CS(R)1: Halton's Spatial Strategy. The Council have taken a number of elements in to consideration when determining the appropriate housing figure for the Borough, and the identified sub-areas. This has included the objectively assessed need identified in the evidence provided for both the Liverpool City Region and the Mid-Mersey, the results of this consultation and the policies of the NPPF.

01530 Craig Barnes Barton Willmore on behalf of JPL 01530/1/017 QUEST 7.4 Housing	It is clear when reviewing the findings of the SHMA that the housing needs of Warrington has substantially increased in contrast to previous assessments (the Core Strategy was submitted on the basis of the need to accommodate 500 dwellings per year). The SHMA now finds housing needs in Warrington to be at least 839 dwellings per year. Like Halton, the expansion of existing settlements in Warrington is constrained by Green Belt. Given the significance of the increase identified, there is now the need for extensive amounts of new land to be identified for housing. In consideration of the close links found by the SHMA between Halton and Warrington, it is considered appropriate for Halton to meet some of this housing need. Where the housing needs of Warrington are accommodated in Halton, it is considered that this should be located towards Northern parts of Widnes. This location has the strongest transport connections to Warrington Town Centre and key employment locations in Warrington such as Omega and Birchwood.	Halton will continue to work with its neighbouring authorities, including those considered to be in the same housing market, as part of the Duty to Cooperate.
01530 Craig Barnes Barton Willmore on behalf of JPL 01530/1/018 QUEST 7.4 Housing	It is considered that the adoption of a mixture of options will be required in order to secure the delivery of specialist housing within the Borough. In arriving at its preferred approach on the delivery of specialist housing the Council must be careful in considering and protecting developer viability. The Council should be clear about the costs of delivering specialist accommodation, and adapting dwellings to lifetime home standards, and how these relate to affordable housing requirements, open space standards, and the potential of introducing a Community Infrastructure Levy. The Council should also consider the likelihood that not all sites identified will be suitable to support the delivery of specialist housing needs, and as a result adopt a sufficiently flexibility policy which reflects this.	Policy RD5: Specialist Housing sets out the Council's proposed approach to the delivery and provision of specialist dwellings. The Council will consider the viability of the policies of the Local Plan, this may include the impact of CIL if it is considered appropriate to introduce CIL in the Borough or across the City Region.

01530 Craig Barnes Barton Willmore on behalf of JPL 01530/1/019 QUEST 7.8 Housing	Policy HI should include a commitment to review the housing requirement if the DALP is adopted in advance of the LSF. This will ensure that the development plan for Halton is consistent with the aims and objective of the wider City Region.	The Council considers that an appropriate level of homes and employment opportunities to meet the OAN and create a sustainable balance for the Borough are set out in Policy CS(R)1: Halton's Spatial Strategy. The Council have worked alongside other authorities from the Liverpool City Region and the LEP to produce a Strategic Housing and Employment Land Market Assessment (SHELMA), which has provided part of the evidence to determine the OAN.
01530 Craig Barnes Barton Willmore on behalf of JPL 01530/1/020 QUEST 7.8 Housing	There is a notable absence of any recognition to the role of Starter Homes from the policy proposals as outlined. Whilst the provision of Starter Homes does not currently form planning policy, the Government, through its preparation of the Housing and Planning Bill and recent consultation on proposed changes to the NPPF, is clearly committed to its delivery. Once this forms law, the Council will be duty bound to ensure the delivery of Starter Homes. Considering the likelihood that these changes will be implemented by the Government, it would be prudent for the Council to consider its response to this issue now, instead of leaving this to a later stage of the plan preparation process, potentially providing for unnecessary delay to the process.	This comment is noted and has been taken into consideration in the drafting of Policy CS(R)13: Affordable Housing. Further text may be added in relation to Starter Homes as and when there is sufficient detail available from Government.
01530 Craig Barnes Barton Willmore on behalf of JPL 01530/1/021 QUEST 7.8 Housing	In selecting sites for allocation, the Council need to adopt a broad strategy identifying sites of varying scale, location and character to promote a consistent supply of housing land throughout the plan period. New allocations will be required in the Green Belt of Halton. These sites should be located in areas of the Borough which are sustainable or can be made sustainable, have least impact on Green Belt objectives, heritage and ecological designations, and can be demonstrated to be deliverable.	Where considered appropriate as part of the Green Belt Study or for non-Green Belt sites, sites that have been submitted for development have been considered through the Site Assessment process. Proposed sites to be released from the Green Belt are set out in Policy GB TEMP: Green Belt Release Allocations, as well as within other appropriate allocation policies (e.g. Policy ED1: Employment Allocations and RD1: Residential Development Allocations), and can be located on the proposed Policies Map.

01530 Craig Barnes Barton Willmore on behalf of JPL 01530/1/022 QUEST 11.6 Sustainable Development in Halton	Our client is supportive of the commitment made by Halton Borough Council to consider the allocation of sites within the Green Belt in order to meet housing needs, and the potential need for a review of the Plan in reflection of the LSF as illustrated in the proposed approach to Policy SD1.	This comment is noted.
01530 Craig Barnes Barton Willmore on behalf of JPL 01530/1/023 QUEST 11.6 Sustainable Development in Halton	The approach taken by the Council to determine development proposals in the Green Belt will need to be reflective of the NPPF. Paragraph 89 of the NPPF sets out exceptions for developments considered as appropriate within the Green Belt. The Council should be aware of current proposals by the Government to amend the current approach to the determination of proposals for the redevelopment of previously developed sites in the Green Belt. Whilst this does not yet form national planning policy, the Council will need to ensure that once and if adopted decision making reflects this more relaxed approach.	As and when there is sufficient detail to provide a policy or appropriate text in relation to previously developed land in the Green Belt this will be included within the Local Plan.
01530 Craig Barnes Barton Willmore on behalf of JPL 01530/1/024 QUEST 12.3 Key Areas of Change	The Council identify four key areas of change within Halton, which are considered important to the delivery of development objectives in the Borough. Whilst our client is supportive of these projects and the rationale behind their selection, the delivery of these projects should not risk the overall deliverability of the Plan. The Council should therefore not attempt to prioritise the delivery of these sites ahead of other less constrained sites especially where it is clear that these sites face significant challenges to coming forward for development.	This comment is noted. The key areas are seen as fundamental to the longer term development of the Borough, however, it is not considered that this will prevent development on other allocated sites or other sites that are considered appropriate for development.

01530 Craig Barnes Barton Willmore on behalf of JPL 01530/1/025 QUEST 13.1 Site Allocations	Our client is supportive of the Council's proposed approach to considering and identifying Site Allocations that will secure the delivery of the DALP. In addition to a Red Line Boundary, the Council should set out clearly the location of allocated sites and proposed uses on a Revised Policies Map. The Council should establish minimum site yields for proposed uses. This should be based on the outcome of an extensive dialog with landowners, site promoters and stakeholders, existing evidence, and reflect the character and constraints of identified sites and their surroundings. Any assumption applied by the Council should be cautious. The adoption of this approach will help to ensure that the full development needs of the Borough are met in full, and the Plan is sufficiently flexible to unpredicted changes in market conditions. The proposed scope of principles for allocated sites is supported by our client. The Council must ensure that when defining these principles, the deliverability of the development is protected. The defining of the projected timescales of allocated sites will provide the Council with a good understanding of the deliverability of the Plan, and enable effective plan monitoring. The identification of phasing for developments should however be indicative. A development which is demonstrated to be deliverable, available, achievable, and sustainable now should not be subject to unnecessary delay. The proposed timescales for delivery of sites should be based of the implementation of realistic assumptions, which is based on information collected from the landowner/site promoter, stakeholders, and is reflective of up-to-date market information, and takes into account individual site constraints/characteristics. They should allow for sufficient time for planning, mitigation and site preparation (including infrastructure works), and reflect a rate of delivery that is realistic for the local market and scale of the Site.	This comment is acknowledged. The proposed allocations are set out Policy ED1: Employment Allocations and Policy RD1: Residential Development Allocations, these can be located on the proposed Policies Map.
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01531 Glyn R Bridge (On behalf of Halebank Parish Council) 01531/1/001 QUEST 6.4 Supporting Halton's Economy	Hale Bank Parish Council has no preference for any Option, but they strongly believe that Option 6.2D should not be adopted. The Parish Council sees no need for Option 6.2D, especially in the Hale area. A swathe of Green Belt within this Parish's boundary has already been removed, so we are already faced with a vast change in the current landscape should the proposed development take place.	The Council have undertaken a review of the Green Belt, this has helped the Council to identify the sites that are most appropriate to release from the Green Belt. The Council have also worked with the Liverpool City Region on a Strategic Housing and Employment Land Market Assessment (SHELMA) which has helped to determine the required housing and employment figures for the Borough. These two key pieces of information alongside the responses to this consultation, other evidence, the chosen strategy for Halton and the Liverpool City Region have all contributed to the determination of where employment land will be allocated in the Local Plan. The proposed allocations are set out Policy ED1: Employment Allocations and can be located on the proposed Policies Map.
01531 Glyn R Bridge (On behalf of Halebank Parish Council) 01531/1/002 QUEST 10.2 Halton's Environment	Hale Bank Parish Council believes that the protection of urban and rural greenspace should be included as an issue and that many of the issues and challenges included in the Sustainability Section should rightfully be included in the Environment Section. The protection of both urban and rural 'greenspaces' (e.g. parks and village greens) for their own social, amenity and environmental value should be considered. The Parish Council also believes that Green Belt and protecting the Borough's heritage are environmental issues, with little relevance to sustainability.	These comments are acknowledged. The format of the document has now been amended to reflect concerns raised in relation to the location of policies.
01531 Glyn R Bridge (On behalf of Halebank Parish Council) 01531/1/003 QUEST 11.1 Sustainable Development in Halton	Hale Bank Parish Council disagrees. They believe that most of the issues in the Sustainability Section are environmental issues, with no direct sustainability concerns. Paragraphs 11.16 to 11.18 all discuss Green Belt which serves five specific purposes, none of which include sustainability. Paragraph 11.19 is about environmental quality, whilst paragraph 21 is about safeguarding heritage assets. All these issues rise above concerns about sustainability, so they should be in Chapter 10.	These comments are acknowledged. The format of the document has now been amended to reflect concerns raised in relation to the location of policies.

01531 Glyn R Bridge (On behalf of Halebank Parish Council) 01531/1/004 QUEST 11.6 Sustainable Development in Halton	Hale Bank Parish Council believes that the scope of policies SD1 to SD11 (not 10 as in the question) inappropriately includes many environmental issues which have no direct impact upon sustainability considerations. Green Belt, design, amenity, environmental improvements, landscape, historic environment and heritage assets have little to do with sustainability. The scope of Policies SD1, SD2, SD4, SD5, SD6, SD7, SD10 and SD11 are not appropriate to and should not be unduly fettered by sustainability considerations. They should be in Chapter 10.	These comments are acknowledged. The format of the document has now been amended to reflect concerns raised in relation to the location of policies.
01531 Glyn R Bridge (On behalf of Halebank Parish Council) 01531/1/005 QUEST 12.3 Key Areas of Change	In addition to the policies listed, Hale Bank Parish Council believes that Policy KAI should also seek to ensure that future 3MG development continues with carry forward its original concept as a rail related facility. It is also important that Policy KAI seeks to ensure 3MG remains true to its concept as a (unique to this region) rail served economic 'powerhouse'. Hale Bank Parish Council is concerned that the proposals for HBC Field have lost sight of this objective. This must not happen again.	The Council will continue to support the use of rail and rail sidings within development on 3MG.
01532 Philip Grant How Planning (on behalf of Redrow Homes) 01532/1/001 QUEST 13.2 Site Allocations	Redrow is currently promoting the following three sites for residential development through the Local Plan process, which are being considered by the Borough Council as part of the Green Belt Review currently being undertaken to identify additional development land to meet the future needs of Widnes and Hale: - Land south of Hale Gate Road, Hale Bank (parcel Refs GB071, GB077 and GB089); - Land at Mill Green Farm, Widnes (parcel Ref. GB036); and - Land east of Barrow's Green Lane, Widnes (parcel Ref. GB045).	These sites are noted. Where considered appropriate as part of the Green Belt Study or for non-Green Belt sites, sites that have been submitted for development have been considered through the Site Assessment process. Proposed sites to be released from the Green Belt are set out in Policy GB TEMP: Green Belt Release Allocations, as well as within other appropriate allocation policies (e.g. Policy ED1: Employment Allocations and RD1: Residential Development Allocations), and can be located on the proposed Policies Map.

01532 Philip Grant How Planning (on behalf of Redrow Homes) 01532/1/002 CHAP 4 Evidence Base	Redrow supports the inclusion of the Widnes & Hale Green Belt Study within this list. In national policy terms, sufficient 'exceptional circumstances' exist which require Green Belt in the Widnes and Hale area to be reviewed and, where appropriate, land to be excluded from it, in order to ensure a sufficient ongoing supply of deliverable development land (including for housing) to meet the requirements of the Borough's communities. The three sites that are being promoted by Redrow for residential development make only a partial contribution to the purposes of including land within the Green Belt, as indicated within the Council's Green Belt Study - Site Assessments Consultation Draft document, which was published in February 2015. Their removal from the Green Belt would not undermine the five purposes of the policy set out in the National Planning Policy Framework. On the contrary, their relatively contained nature and location on the edge of the built up area of Widnes would ensure that a long term, defensible Green Belt boundary was established and could endure for the foreseeable future.	These comments are noted.
01532 Philip Grant How Planning (on behalf of Redrow Homes) 01532/1/003 QUEST 5.1 Vision and Objectives	Redrow agrees that one of the key challenges for the Delivery and Allocation Local Plan is to deliver and secure a balanced housing offer within Halton which is appropriate to local markets and ultimately supports the Borough's economic growth. The review of existing Green Belt in the Widnes and Hale area that is currently being undertaken by the Borough Council has the potential to play a key role in meeting this challenge by helping to provide the new residential development that will be essential for the purposes of delivering significant economic growth in Halton and providing much needed family housing in multiple locations across the town.	This comment is noted.

01532 Philip Grant How Planning (on behalf of Redrow Homes) 01532/1/004 QUEST 5.3 Vision and Objectives	Redrow supports the strategic objectives which aim to create and support attractive, accessible and adaptable residential neighbourhoods where people want to live, and to provide good quality, affordable accommodation and a wide mix of housing types to create balanced communities. The release of the land south of Hale Gate Road in Hale Bank, the land at Mill Green Farm and the land east of Barrow's Green Lane in Widnes for residential development would play an important role in helping to achieve these strategic objectives.	Redrow's support is noted.
01532 Philip Grant How Planning (on behalf of Redrow Homes) 01532/1/005 QUEST 7.1 Housing	Redrow agrees with the Borough Council that there are limited remaining development opportunities on previously developed land and welcomes the recognition made at paragraph 7.13 that a greater proportion of future development will need to take place on greenfield sites, including sites in the Green Belt. The three Green Belt sites being promoted by Redrow are all available, suitable, achievable and viable for new housing development. In addition, they each provide the scope to accommodate larger family housing, for which there is an identified deficiency in Halton at present, as stated at paragraph 7.3 of the Scoping Document.	These comments are noted. It is important to note that where considered appropriate as part of the Green Belt Study, sites that have been submitted for development have been considered through the Site Assessment process. Proposed sites to be released from the Green Belt are set out in Policy GB TEMP: Green Belt Release Allocations, as well as within other appropriate allocation policies (e.g. Policy ED1: Employment Allocations and RD1: Residential Development Allocations), and can be located on the proposed Policies Map.
01532 Philip Grant How Planning (on behalf of Redrow Homes) 01532/1/006 QUEST 7.4 Housing	Redrow considers that Option 7.1B, which is to have a housing requirement higher than the Objectively Assessed Need (OAN), would be the most appropriate option. This scenario would allow for an increase in working age people which is essential to enable the delivery of sustainable economic growth within Halton. It would also increase the levels of affordability in the Borough and help to meet the housing need of other local authorities. Option 7.1B would lend support for the residential development of the three sites being promoted by Redrow, which would all provide a balanced mix of housing sizes, types and tenures (including an element of affordable housing) whilst enhancing the physical and environmental assets of the sites, including through the provision of public open space and potential additional community facilities.	These comments are noted. The Council considers that an appropriate level of homes and employment opportunities to meet the OAN and create a sustainable balance for the Borough are set out in Policy CS(R)1: Halton's Spatial Strategy. The Council have taken a number of elements into consideration when determining the appropriate housing figure for the Borough, and the identified sub-areas. This has included the objectively assessed need identified in the evidence provided for both the Liverpool City Region and the Mersey, the results of this consultation and the policies of the NPPF.

01532 Philip Grant How Planning (on behalf of Redrow Homes) 01532/1/007 QUEST 11.1 Sustainable Development in Halton	Redrow agrees within the Borough Council that one of the challenges to be addressed in the Local Plan is the need to alter the Green Belt boundary to provide the land required to meet local housing requirements. It is clear that there are sites present within the Borough, in particular those being promoted by Redrow, which are appropriate for release from the Green Belt to provide for new housing.	This comment is noted.
01532 Philip Grant How Planning (on behalf of Redrow Homes) 01532/1/008 QUEST 11.1 Sustainable Development in Halton	Redrow also agrees that it is critical to ensure that sufficient appropriate Safeguarded Land is provided for future development needs. The Scoping Document states that the Safeguarded Land is not proposed in this Plan period but may be required post 2037 if a future review of the Plan identifies further needs for development. Redrow considers that the Local Plan should contain a specific requirement for Safeguarded Land and identify appropriate sites (e.g. based upon a 15 year projection post 2037). This would allow a long term, defensible Green Belt boundary to be established until at least the early 2050's, in accordance with UK Government guidance that one of the essential characteristics of the Green Belt is its permanence (as referenced at paragraph 79 of the National Planning Practice Guidance document).	Given the comments from Redrow and others, further clarification has been added to the text in relation to Safeguarded Land. Policy GB2 sets out the policy for Safeguarded Land.
01532 Philip Grant How Planning (on behalf of Redrow Homes) 01532/1/009 QUEST 11.4 Sustainable Development in Halton	Redrow fully supports the principle of including within the Delivery and Allocations Local Plan a policy covering Green Belt Release Allocations which will be dependent on the outcome of the Green Belt Study. Redrow and its team of advisers look forward to working with the Borough Council and its partners in promoting the three sites in Hale Bank and Widnes through the future stages of the Green Belt Study and Local Plan process, and to continue to achieve a high quality of new residential development that has recently been achieved by Redrow in Halton through the development of the Lancaster Place and Barrow's Green sites.	These comments are noted. This policy is identified as Policy GBTemp: Green Belt Release Allocations.

01532 Philip Grant How Planning (on behalf of Redrow Homes) 01532/1/010 QUEST 13.1 Site Allocations	Whilst Redrow would not be opposed to Site Allocation policies providing indicative development capacities (e.g. the number of residential units), steps should be taken to ensure that ceiling figures are not specified, as it is likely that the precise development capacity of the sites promoted by Redrow would only be established once detailed design work had been completed.	This comment is noted. The Council will look to work with appropriate stakeholders to achieve appropriate indicative capacity figures for each of its Site Allocations.
01533 Andrew Rose Spawforths (on behalf of Daresbury SIC) 01533/1/001 CHAP 6 Supporting Halton's Economy	Daresbury SIC LLP supports the approach towards delivering economic growth for the Borough.	This comment is noted.

01533 Andrew Rose Spawforths (on behalf of Daresbury SIC) 01533/1/002 CHAP 6 Supporting Halton's Economy	Daresbury SIC LLP considers that the role and function and importance of Sci-Tech Daresbury should be emphasised within the Delivery and Allocations Local Plan (DALP). Daresbury SIC LLP would like to emphasise that Sci-Tech Daresbury has been selected by the Government as one of the UK's only two national Science and Innovation Campuses. Importantly it is the only Science and Innovation Campus in the north of England. Sci-Tech Daresbury is a high profile development bringing together high-tech businesses, universities, research organisations, and the business support and investor communities, to more effectively develop, and commercially exploit, the UK's world-class science base. Furthermore, the campus and surrounding land, including the adjacent site, has been established as an Enterprise Zone. STFC, Langtree Group and Halton Borough Council have formed a public-private joint venture at Daresbury Science and Innovation Campus to stimulate the UK economy by building on the presence of the established laboratory to deliver further development on the site as one of the world's principal locations for scientific research, innovative technology development and entrepreneurial collaboration. The 20-year joint venture between the public and private sectors will bring more than 10,000 jobs to the area during its lifetime, attracting further domestic and international positive inward investment in world class scientific research and innovation. To overcome the objection and address soundness matters, the Council should: - Emphasise and highlight the role of Sci-Tech Daresbury in the economic growth aspirations for the Borough and its importance to the wider region.	Further information in relation to the role of Sci-Tech Daresbury in the Borough and the wider region has been included within the justification for the employment allocations within the Borough.
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01533 Andrew Rose Spawforths (on behalf of Daresbury SIC) 01533/1/003 CHAP 6 Supporting Halton's Economy	A Masterplan is currently being prepared which will create the vision and aspiration for the area with the aim of delivering new jobs and economic growth for the area whilst creating an environment for fostering research and development.	It will be beneficial to feed the masterplan for the site, along with the current details for the site and its future contributions to delivering jobs and economic growth into the ongoing work on the production of the Halton Local Plan.
01533 Andrew Rose Spawforths (on behalf of Daresbury SIC) 01533/1/004 CHAP 12 Key Area of Change	Daresbury SIC LLP welcomes the identification of the East Runcorn Key Area of Change (Policy KA4), which includes Sci-Tech Daresbury. The table in Paragraph 12.10 appears to indicate that Policy KA4 will review and replace Core Strategy Policy CS11 and include a site specific policy and an illustrative layout, which are currently contained in Policy CS11. Daresbury SIC LLP welcomes the review of Policy CS11 but would like to fully understand the relationship between CS11 and KA4 and whether Policy CS11 is being fully replaced with Policy KA4. Any evolution of the policy should be fully informed and based upon a robust evidence base, including technical information and be viable and deliverable, particularly with regard to the infrastructure requirements for the site and the new vehicular route. Daresbury SIC LLP is currently preparing a masterplan for the site, which will be submitted in due course. To overcome the objection and address soundness matters, the Council should: - Explain if DALP Policy KA4 is replacing Core Strategy Policy CS11. - Ensure Policy KA4 is based upon up-to-date and robust evidence, particularly with regard to infrastructure requirements. - Take into account Daresbury SIC LLP's masterplan.	It is likely that Policy KA4 will supersede and replace policy CS11. The Council will seek to work closely with Daresbury SIC LLP amongst others to ensure that an appropriate policy is prepared for the area.

01534 Stuart Barnes Knowsley Council 01534/1/001 ALL All DALP	In general, we support the content of the Scoping Document and the plan preparation process. In particular, we note that the scoping document appears to be an extremely thorough and logical approach to presenting what the Local Plan will contain, which is welcomed.	This comment is noted.
01534 Stuart Barnes Knowsley Council 01534/1/002 CHAP 4 Evidence Base	We welcome reference to the Liverpool City Region Strategic Housing and Employment Land Market Assessment as a key evidence base document. You will need to consider how the findings of this study will inform the content of the Local Plan for both housing and employment policies, alongside the Mid-Mersey Strategic Housing Market Assessment work.	Where evidence has been available to feed into the production of the Halton Local Plan the Council have taken it in to consideration.
01534 Stuart Barnes Knowsley Council 01534/1/003 CHAP 13 Site Allocations	We note that the majority of future housing and employment land supply may need to come from Green Belt sites. As you will recall, Knowsley Council was consulted at earlier stages of the preparation of this Plan and we have previously raised with yourselves the issue of proposed Green Belt review and release in the Widnes/Hale area of Halton, and the need to ensure that any resultant impacts on Knowsley's communities are addressed, both in terms of cross-boundary issues and of shared housing market areas. Having reviewed the consultation documents recently published, including the proposed scope of the DALP for Halton, this issue remains our central area of interest as the Plan progresses towards the Publication stage.	The Council will continue to work with Knowsley through the Duty to Cooperate in relation to the release of Green Belt and another appropriate strategic cross boundary issues.

01535 Rebecca Sowerbutts Cushman and Wakefield (on behalf of Bellway Homes) 01535/1/001 QUEST 2.1 Policy Framework	Whilst the recent devolution agreement is not intended to delay the production of plans there are several pieces of work being undertaken at this level which will have a direct bearing upon the plan and will need to be taken into account. Such relevant documents include the 'City Region-wide Growth Strategy' which was commissioned by the Liverpool City Region Combined Authority (CA) in late 2015, with publication anticipated during summer 2016, and the joint 'Strategic Housing and Employment Land Market Assessment'. It is considered that failure to take account of this regional work would jeopardise both the soundness of the plan and compliance with the Duty to Co-operate. These and other city region-wide studies and strategies will need to be fed into the Local Plan and appropriate actions included.	The Council agree that where work commissioned by the Liverpool City Region, such as the Growth Strategy and the SHELMA, is available to feed into the production of the Halton Local Plan it should be taken into consideration.
01535 Rebecca Sowerbutts Cushman and Wakefield (on behalf of Bellway Homes) 01535/1/002 QUEST 2.2 Policy Framework	Bellway support the Council in proceeding with the DALP pending the details of the production of the Liverpool City Region Strategic Framework. The Devolution Agreement requires that the development of the Strategic Framework must not delay the preparation of Local Plans. Furthermore, the continuation of work on the DALP and its subsequent adoption will provide greater certainty to enable the delivery of much needed housing within Halton in the short to medium-term, to the benefit of the local economy, community and environment. The timescale for the production of the Liverpool City Region Strategic Framework is currently unknown and as such it would not be appropriate to wait indefinitely for this work to commence and progress through the various stages of plan-making. However, it is evident that the City Region Framework and its evidence base will have significant implications for the Delivery and Allocations Local Plan. The Delivery and Allocations Local Plan therefore should take account of the emerging evidence and it should also provide clear and robust early review mechanisms to ensure that the plan responds appropriately to the eventual production and adoption of a Liverpool City Region Strategic Framework.	The Council concur with Bellway that it would not be appropriate to wait indefinitely for the production of the Liverpool City Region Strategic Framework. However, where evidence is available to feed into the production of the Halton Local Plan the Council will take it in to consideration. The Council will also endeavour to ensure that the Local Plan provides appropriate mechanisms and flexibility to take the Liverpool City Region Strategic Framework into account.

01535 Rebecca Sowerbutts Cushman and Wakefield (on behalf of Bellway Homes) 01535/1/003 QUEST 7.1 Housing	Bellway agrees that the issues and challenges identified are those that should be addressed in relation to housing in the DALP. The main issue and challenge is considered to be the amount of new homes that are needed to meet the requirements of the OAN and the economic aspirations of the Local Authority. The spatial distribution of these dwellings will also be important and requires careful consideration. The fact that there are limited brownfield sites remaining in the Borough is also a significant issue and the Council must consider how this will be addressed, where greenfield land will be released and indeed where and how much Green Belt land release will take place.	These comments are acknowledged.
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01535 Rebecca Sowerbutts Cushman and Wakefield (on behalf of Bellway Homes) 01535/1/004 QUEST 7.4 Housing	With regards to options 7.1 A- 7.1D Bellway consider that option 7.1D should be seen as the minimum figure for the housing requirement, i.e. the Core Strategy requirement of 552 dwellings per annum. Bellway also wish to provide comment on the evidence and presumptions contained in other options. Option 7.1B Option 7.1B should be investigated and assessed in detail. Whilst the OAN is 466 dwellings per annum it is important to apply sensitivity tests and consider other influencing factors such as the need to retain and increase the number of working age population in the Borough (which is currently low) and the need to increase the level of affordability across the Borough. The amount of housing required needs to be carefully considered and the economic growth aspirations of the authority should be weighed in the balance. This option should reference the need to align the employment and housing strategies of the Council and City Region, as identified by the NPPF and PPG (2a-018). On review of the OAN, the 2016 SHMA and its recommendations are noted however a detailed review of the data and assumptions contained within the 2016 SHMA has not, at this stage, been undertaken. The overall methodology of the SHMA also appears to generally accord with the principles set out within the NPPF and PPG. Notwithstanding the above statement, Bellway do have some concerns regarding the choice of scenarios used within the SHMA study which are considered to potentially lead to a suppression of the overall housing need figure. In this regard it is considered that 466dpa is unlikely to represent the full objectively assessed housing need for the area and there appears to be justification for an increase. Concerns are raised by Cushman and Wakefield include: - The scenarios which utilise UPC need to be considered in greater detail to ensure that they are soundly based. - The study does not provide analysis of historic factors, which may have implications upon the future rate of both population and housing growth. - Whilst it is recognised that the market signals across Halton are not as acute as elsewhere it is apparent that there remain issues with regards to affordability, identifying a need for 119 affordable units per annum, an	These comments are noted. The Council considers that an appropriate level of homes and employment opportunities to meet the OAN and create a sustainable balance for the Borough are set out in Policy CS(R)1: Halton's Spatial Strategy. The Council are content with the evidence and methodology used within the Mid-Mersey and feel that it provides an appropriate OAN for Halton. However, the Council have undertaken further work in relation to their OAN, alongside other authorities from the Liverpool City Region producing a Strategic Housing and Employment Land Market Assessment (SHELMA).
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01535 Rebecca Sowerbutts Cushman and Wakefield (on behalf of Bellway Homes) 01535/I/005 QUEST 7.4 Housing	Bellway do not have any specific comments regarding options 7.2A to 7.2C.	This comment is noted. No action is required.
01535 Rebecca Sowerbutts Cushman and Wakefield (on behalf of Bellway Homes) 01535/I/006 QUEST 7.4 Housing	Options 7.3A - 7.3D In terms of options 7.3A - 7.3D, whilst Bellway support the need to provide for specialist housing, they would not support a requirement for provision of specialist accommodation on all development sites/allocated sites (option 7.3A) nor would they support a requirement for all sites to include a proportion of Lifetime Homes (option 7.3B). It should be noted that the Lifetime Homes standard is no longer applicable following the Government's Housing Standards review. Lifetime Homes have now been replaced by the optional Building Regulations accessibility standards. These standards can be introduced via a plan but only where there is specific evidence to justify their inclusion. Bellway are not aware that the Council have prepared the necessary evidence at this stage and as such this option is not recommended or supported. Without evidence to justify a proportion of specialist provision it is not considered appropriate for the Council to include such a specific requirement. It should also be noted that it may not be feasible nor desirable to make a provision for specialist housing on many sites due to issues such as location, need for services, topography and viability. A blanket requirement for all sites to provide for such accommodation is unlikely to be practical nor deliverable.	Bellway's support for the need to provide specialist housing is supported. The Council have noted that the Lifetime Homes standard is no longer applicable and will not continue to refer to it. The Council have also noted Bellway's comments in relation to the evidence for specialist housing and this has been taken into consideration when drafting policy RD5: Specialist Housing.

01535 Rebecca Sowerbutts Cushman and Wakefield (on behalf of Bellway Homes) 01535/1/007 QUEST 7.5 Housing	The policy areas generally appear appropriate. In formulating policies it is important that the Council provides a positive framework which enables appropriate development to occur and does not place undue constraints and burdens upon the development industry.	This comment is noted.
01535 Rebecca Sowerbutts Cushman and Wakefield (on behalf of Bellway Homes) 01535/1/008 QUEST 7.6 Housing	Bellway considers that all policies will require either amending or complete replacement to ensure they are up to date and to reflect new evidence on issues such as the housing requirement, viability, additional sites and to ensure that the plan reflects the wider Liverpool City Region growth agenda.	This comment is noted. The Council has reviewed the existing policies to ensure that they are appropriate and reflective of current evidence and policy. The policies to be replaced are clearly set out within the document, these include those in relation to the housing requirements, and allocations.
01535 Rebecca Sowerbutts Cushman and Wakefield (on behalf of Bellway Homes) 01535/1/009 QUEST 11.1 Sustainable Development in Halton	Bellway agree that the issues and challenges identified are those that should be addressed in relation to Sustainable Development in the Delivery and Allocations Local Plan, particularly the issue of Green Belt land release and boundary review, acknowledging that the Local Planning Authority must release land from the Green Belt in order to meet its housing needs. NPPF paragraphs 83-85 provides a mechanism for the release of Green Belt land through the Local Plan process and requires local authorities to demonstrate exceptional circumstances for Green Belt release. Such exceptional circumstances can include demonstrating that all other avenues of delivery have been explored to meet the housing needs of an area. On this basis Bellway agrees that Green Belt release should be considered through the DALP.	This comment is noted. In particular it is noted that Bellway agrees that Green Belt release should be considered through the DALP.

01535 Rebecca Sowerbutts Cushman and Wakefield (on behalf of Bellway Homes) 01535/1/010 QUEST 11.3 Sustainable Development in Halton	The inclusion of policies SD1 'Green Belt Release Allocations' and SD3 'Safeguarded Land' is supported by Bellway. The NPPF, paragraphs 83 to 85, provides the mechanism for releasing Green Belt through the Local Plan process and requires local authorities to demonstrate exceptional circumstances. Providing other avenues of delivery have been explored the need to meet the housing needs of an area has been accepted to meet exceptional circumstances in other Local Plan examinations. In this regard, and taking account of the wider growth ambitions of the city region, as well as the need to increase the levels of house building within Halton, it is agreed that Green Belt release should be considered through the plan. The principle of safeguarded land and its identification is also supported, this should provide certainty over the Green Belt boundaries beyond the plan period, which is consistent with the NPPF, paragraph 85.	The Council acknowledge Bellway's support of the policies SD1 and SD3, along with Bellway's agreement of the release of Green Belt and the principle of safeguarded land.
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01536
Kate Wheeler
Natural England
01536/1/001
CHAP 5 Vision and
Objectives

This section includes reference to the environment, "Protect and Enhance the Environment" Whilst we welcome this objective we suggest it is broadened to include maintain Halton's habitats and biodiversity, as Local plan policies are expected to continue to strengthen their conservation and encourage their enhancement in new development. The potential negative impacts of increased access on sensitive habitats, including designated sites, should be recognised. The pressures of increased access associated with development should be recognised and mitigation recommendations ultimately identified.

In accordance with the Environment White Paper The Natural Choice - making space for nature, the Biodiversity 2020 strategy and the NPPF, objectives should go beyond safeguarding biodiversity. The Sustainability Appraisal should ensure that policies within the merging plan conserve and enhance the natural environment to ensure there is a net gain in biodiversity. Merely safeguarding biodiversity would not achieve this national objective. The objectives should ensure the sustainable use of natural resources, including soils and geodiversity. Soils form the thin layer of our geodiversity, linking the underlying geology with the land surface and atmosphere. Therefore it is important to make the link between geodiversity, biodiversity and soil resources. Further guidance on soils, including links to important publications such as 'Safeguarding our soils: A strategy for England' (Defra, 2009) can be found on Natural England website. Important soil resources should be protected (e.g. best and most versatile (BMV) agricultural land) and appropriate management and handling of soils during the development process is essential. 'Safeguarding our soils' provides a clear vision in relation to development and soils - we should 'prevent further degradation of our soils, enhance, restore and ensure their resilience, and improve our understanding of the threats to soil and best practice in responding to them.'

Planning policies should take a strategic approach to the conservation, enhancement and restoration of geodiversity, and promote opportunities for the incorporation of geodiversity interest as part of development.

Local authorities should ensure that appropriate weight is attached to the geodiversity interest of designated sites as well as geodiversity interests within the wider environment, and maximise opportunities to include geodiversity in and around developments as part of the design process.

Due to the limited nature of changes requested the Council are not intending to amend the Strategic Objectives of the Plan.

01536 Kate Wheeler Natural England 01536/1/002 CHAP 5 Vision and Objectives	Green Infrastructure (GI) and the inclusion of a specific strategic objective at 10 is welcomed, in order to ensure green infrastructure delivers a wider range of benefits a specific green infrastructure objective is recommended to seek to deliver multifunctional green infrastructure. Natural England considers that the environmental objectives, and some of the social and economic objectives could be improved by further emphasising the importance of GI and its multifunctional benefits, which would assist in the delivery of a range of SA topic areas, e.g. biodiversity, landscape, health and wellbeing and climate change. The NPPF defines GI as "a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities". With regards to protected species Natural England has produced standing advice that you will find helpful, it is available on our website Natural England Standing Advice to help the local planning authorities to better understand the impact of particular developments on protected or BAP species should they be identified as an issue. The standing advice also sets out when, following receipt of survey information, the local planning authority may need to undertake further consultation with Natural England. 10. Support the conservation and enhancement of the historic and natural environment including designated sites and species and the Borough's green infrastructure in order to maximise social, economic and environmental benefits. Add maintain here and refer to biodiversity, soils and geodiversity.	This comment is noted.
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01537 Simon Artiss Barratt Homes 01537/1/001 CHAP I Introduction	We note your comments at Paras 1.4 & 1.5.	This comment is noted.
01537 Simon Artiss Barratt Homes 01537/1/002 CHAP I Introduction	Para 1.7 - note you will use the DALP to update housing policies in your adopted 2013 Core Strategy. If this is quicker, fine.	The Council considered alternative routes to review the planning policy for Halton, and decided that this option was likely to produce the most efficient and effective outcome for Halton.
01537 Simon Artiss Barratt Homes 01537/1/003 QUEST 2.1 Policy Framework	We note that, whilst NPPF pre-dates your Core Strategy, you recognise the need to update and support the DALP reflecting both NPPF and NPPG.	This comment is acknowledged.
01537 Simon Artiss Barratt Homes 01537/1/004 QUEST 2.2 Policy Framework	The Liverpool RSF is at a VERY early stage with few details regarding the structure and timescales so, YES, please crack on with your DALP.	This comment is acknowledged, it is intended that the Council will proceed with the production of the DALP.
01537 Simon Artiss Barratt Homes 01537/1/005 QUEST 3.1 Supporting Documents	We note your involvement with the Mid-Mersey SHMA and seek to ensure that it is a robust exercise. Ultimately, Halton must assess its own housing needs and meet these, having a good understanding of its local housing market.	Halton will continue to ensure that it has an appropriate evidence base, and good understanding of its local housing market in order to set an appropriate housing figure.

01537 Simon Artiss Barratt Homes 01537/1/006 QUEST 4.1 Evidence	It would be useful to know the timescales for your ongoing Green Belt Study as this is a key evidence for the DALP.	The Council consider the Green Belt Study as an iterative document that may continue to evolve as sites are considered in the Halton Local Plan and as and when more information becomes available.
01537 Simon Artiss Barratt Homes 01537/1/007 QUEST 7.5 Housing	You will know which policies will be impacted by an NPPF-compliant review of your OAN, which is required to support your DALP.	The Council consider that they have identified the relevant Core Strategy policies to be replaced or reviewed in light of the NPPF and OAN.
01537 Simon Artiss Barratt Homes 01537/1/008 QUEST 7.6 Housing	As many as possible in order to update your 2013 CS, which you acknowledge to be out-of-date. We're keen to agree the content of these policies with you.	The Council consider that they have identified the relevant Core Strategy policies to be replaced or reviewed in order to make sure the document is up to date. The Council acknowledge Barratts eagerness to agree the content of these policies.
01537 Simon Artiss Barratt Homes 01537/1/009 ALL All DALP	Consideration will need to be given to the viability of development including CIL and the requirements of the Local Plan policies, this will need to inform the CIL and any policies on Developer Contributions.	The Council will consider the viability of the policies of the Local Plan, this may include the impact of CIL if it is considered appropriate to introduce CIL in the Borough or across the City Region.

01539 Rhian Harris How Planning 01539/1/001 QUEST 13.2 Site Allocations	I am writing on behalf of our client, Daresbury Properties Ltd, these representations relate to six parcels of land located adjacent to Daresbury village. All six sites are sustainably located in close proximity to Daresbury and represent opportunities to maintain and enhance the vitality of the village. Each site submitted is located on self-contained parcels of land with clearly defined, defensible boundaries. The sites are suitable, available and achievable. All of the sites would make a positive contribution to both Daresbury and Halton's housing needs. A proportionate amount of growth with Daresbury over the plan period is essential to maintaining and enhancing the vitality of the village. All of the sites promoted here are well linked to existing residential areas and are within easy walking distance of Daresbury village centre which has a range of services and facilities. As such it is our contention that they should be considered for allocation in the Delivery and Allocation Local Plan (DALP), as they are suitable, available and achievable, subject to their removal from the Green Belt.	These sites are noted. Where considered appropriate as part of the Green Belt Study or for non-Green Belt sites, sites that have been submitted for development have been considered through the Site Assessment process. Proposed sites to be released from the Green Belt are set out in Policy GB TEMP: Green Belt Release Allocations, as well as within other appropriate allocation policies (e.g. Policy ED1: Employment Allocations and RD1: Residential Development Allocations), and can be located on the proposed Policies Map.
01540 Andrew Farrell 01540/1/001 QUEST 13.2 Site Allocations	Having studied your documents and reports and the property at Parcel GB1 10, Pond House, Ramsbrook Lane, Hale. I would be favoured of future development of this high scoring site, coupled with neighbouring small parcels. The land is well suited and has good services and access and is a deliverable proposal. As long as the developments are modest and in keeping with the village. My view is that your reports are very thorough and should be commended.	These comments are noted.

01541 Mr G And Mrs E Ellis 01541/1/001 QUEST 13.2 Site Allocations	Proposed site allocation at Abbey Farm and The Barn, Abbey Farm, South Lane, Widnes, with a suggested potential capacity for 80no. 2 and 3 bed dwellings.	This site is noted. Where considered appropriate as part of the Green Belt Study or for non-Green Belt sites, sites that have been submitted for development have been considered through the Site Assessment process. Proposed sites to be released from the Green Belt are set out in Policy GB TEMP: Green Belt Release Allocations, as well as within other appropriate allocation policies (e.g. Policy ED1: Employment Allocations and RD1: Residential Development Allocations), and can be located on the proposed Policies Map.
01542 Philip Morris Widnes Golf Club 01542/1/001 QUEST 13.2 Site Allocations	It is clear, from documentation available online, that there is insufficient land available in Widnes to meet the whole of its future housing needs and as a result, a review of the Greenbelt in Widnes and Hale is taking place. If it is the case that release of land from the Greenbelt to provide land for housing is currently seen as inevitable, the fact that sustainable development is now a central plank of government policy and that current planning guidance requires a presumption in favour of sustainable development, it must be appropriate to consider whether development on the golf course would provide a more suitable long term solution for the housing land issues than a rolling back of what is already a limited area of greenbelt. Housing on the existing golf course would be in an area that is clearly sustainable in terms of its access to local amenities, schools, shops, public transport etc. and the Club already has agreement in principle in place with the owners of land at Pex Hill that would allow a replacement golf course to be built.	This site is noted. Sites submitted for development will be considered through the Site Assessment process. The proposed allocations are set out Policy RD1: Residential Development Allocations and can be located on the proposed Policies Map.

01542 Philip Morris Widnes Golf Club 01542/1/002 QUEST 13.2 Site Allocations	Housing land values achieved in Widnes recently indicate that the finance necessary to achieve relocation could be obtained by developing only part of the existing course leaving the remaining Greenspace accessible to the whole of the local community. Such development would make a major contribution to the future housing needs of the Borough and would reduce, or possibly eliminate, the need to develop less sustainably by taking land from the current Green Belt. A substantial area of Greenspace within the town currently accessible only to members of a private club would remain Greenspace but accessible to the whole of the local community and in constructing a new golf course at Pex Hill, a large area of Green Belt land on the fringes of the Borough would be protected from urban development in perpetuity. A new, high quality golf course would enhance the sporting and recreational facilities within the town. It would enable the Club to provide teaching facilities to introduce newcomers to the game, particularly youngsters, that it cannot provide satisfactorily at the existing course. Clearly this is a complex issue and the reasons why the Club has concerns over future viability may not be immediately obvious. The Club would therefore welcome an opportunity to explain to the Council, in detail, why it has continued to pursue this objective for such an extended period of time. We believe that there is an opening here for the Club and the Council to work together to achieve a solution that would not only resolve some of the housing land issues but would also provide long term benefits for the town, its residents and the local community in general.	This site is noted. Sites submitted for development will be considered through the Site Assessment process. The proposed allocations are set out Policy RD1: Residential Development Allocations and can be located on the proposed Policies Map. The Council will continue to work with stakeholders such as the Golf Club.
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01543 Mr And Mrs R Owen 01543/1/001 QUEST 13.2 Site Allocations	Proposed site allocation at Wilmere Park, Wilmere Lane, Widnes, suggested capacity of 45 dwellings.	This site is noted. Where considered appropriate as part of the Green Belt Study or for non-Green Belt sites, sites that have been submitted for development have been considered through the Site Assessment process. Proposed sites to be released from the Green Belt are set out in Policy GB TEMP: Green Belt Release Allocations, as well as within other appropriate allocation policies (e.g. Policy ED1: Employment Allocations and RD1: Residential Development Allocations), and can be located on the proposed Policies Map.
S014 Diane Clarke Network Rail S014/1/001 ALL DALP	Developer Contributions Consideration should be given to financial contributions from developers from the CIL being used towards enhancements at railway station within the LPA area, which may be required as a result of increased footfall as a result of redevelopment / increased numbers of dwellings in the area. As Network Rail is a public body it is not reasonable to expect funding for railway infrastructure mitigation measures as a result of third party commercial developments.	The Council are considering the potential for CIL and as part of this they will consider the comments made by Network Rail in relation to the potential I23 List and the Infrastructure Development Plan.

S014 Diane Clarke Network Rail S014/I/002 CHAP 13 Site Allocations	Level Crossings The Council is urged to take the view that level crossings can be impacted in a variety of ways by planning proposals: (a) By a proposal being directly next to a level crossing (b) By the cumulative effect of smaller developments added over time (c) By the type of level crossing involved e.g. where pedestrians only are allowed to use the level crossing, but a proposal involves allowing cyclists to use the route (d) By the construction of large developments (commercial and residential) where road access to and from the site includes a level crossing or the level / type of use of a level crossing increases as a result of diverted traffic or a new highway (e) By developments that might impede pedestrians ability to hear approaching trains at a level crossing, e.g. new airports or new runways / highways / roads (f) By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs (g) By any developments for schools, colleges or nurseries where minors in numbers may be using the level crossing (h) By proposals that change the demographic of users - from say occasional agricultural usage to (but not limited to) increased usage by minors, dog walkers, the elderly, cyclists and mountain bikers, pedestrian using smart-phones, with ear-phones with little or no appreciation of the risks from approaching trains at footpath level crossings.	These comments have been taken into consideration when preparing the Local Plan.
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S055 Miss Rachael A Bust Planning and Local Authority Liaison, The Coal Authority S055/3/001 ALL All DALP	Comments on Coal Issues in Halton Area Coal Resources As you will be aware, the Halton Borough Council area contains only a tiny area of coal resources which are capable of extraction by surface mining operations. The Borough is however underlain by deep coal resources. There are licences in existence for the extraction of coal bed methane within Halton. Coal Mining Legacy As you will be aware, the Halton Borough Council area there is only very limited mining legacy, there are no recorded mine entries but a single mine gas site is recorded right on the very north-eastern edge of the plan area. Land instability arising from mining legacy is therefore unlikely to occur.	This comment is noted.
S055 Miss Rachael A Bust Planning and Local Authority Liaison, The Coal Authority S055/3/002 QUEST 10.6 Halton's Environment	The Coal Authority is pleased to see that MSA's will be identified on the Policies Map and that the policy aim includes a requirement for restoration of minerals sites. The proposed policy should also set out a policy framework which allows for the extraction of conventional and unconventional hydrocarbons, including coal bed methane and other technologies such as underground coal gasification.	Policy HE1 I: Minerals provides the policy context for mineral extraction including those for the extraction of conventional and unconventional hydrocarbons.
S055 Miss Rachael A Bust Planning and Local Authority Liaison, The Coal Authority S055/3/003 QUEST 13.2 Site Allocations	I have discussed the matter with our Property Division and would like to confirm that the Coal Authority does not wish to nominate any sites for inclusion within the assessment.	This comment is noted, no action is required.

S094 Emily Hrycan Historic England S094/2/001 QUEST 4.1 Evidence Base	Evidence base A sound local plan should be based on an up-to-date evidence base which includes reference to the historic environment. The evidence base needs to identify: - o What contribution the historic environment makes to the character of the area, to its economic well-being and to the quality of life of its communities; - o What issues and challenges it is facing and likely to be facing in the future; - o What opportunities the historic environment offers for helping to deliver the other objectives in the Plan area. When undertaking this exercise, it is important to bear in mind that it is not simply an exercise in listing known sites but, rather understanding their value to society (i.e. their significance). There is a need to identify the subtle qualities of the Borough and its local distinctiveness and character which can easily be lost. There will need to be an assessment of the likelihood of currently unidentified heritage assets including sites of historic and archaeological interest being discovered in the future. It may also be necessary to identify heritage assets outside the Council's area where there are likely to be setting impacts caused by any development proposals put forward in the area. Evidence gathering can also help to identify parts of a locality that may be worthy of designation as a conservation area and identify assets that are worthy of inclusion in a local list. Where the evidence base is weak, the Council will need to commission additional work to ensure that the historic environment is adequately dealt with and can be used to inform the Plan.	These comments are noted and have been taken into consideration in preparing policies and in identifying sites for development and designation.
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S094 Emily Hrycan Historic England S094/2/002 QUEST 11.6 Sustainable Development in Halton	Key issues to be considered are (not wholly comprehensive): - o Undesignated heritage assets (including significance of, setting, extensions, demolition, alterations, change of use, etc.) - o Designated heritage assets (including significance of, setting, extensions, demolition, alterations, change of use, etc.) - o Archaeology including remains of less than national importance - o Conservation areas - o Registered parks and gardens - o Heritage at Risk - o Important views and vistas - o Landscape character - o Local character and distinctiveness - o Individual settlements - o Historic shop fronts and advertisements - o Public realm - o Design - o Information to accompany an application	These comments are noted and have been taken into consideration in preparing policies and in identifying sites for development and designation.
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S094 Emily Hrycan Historic England S094/2/003 ALL DALP	Strategic Cross Boundary Issues Strategic cross boundary issues that affect the historic environment are issues that can only be effectively addressed at a larger than local scale and may cover the issues listed below, this is not an exclusive list and strategic issues will have to be considered on an area by area basis. - o extensive designated and non-designated heritage assets, e.g. World Heritage Sites, historic landscapes, - o major heritage based tourism attractions, the management of which may impact upon more than one authority - o major quarries for building and roofing stone, e.g. Portland stone - o major changes to green belt which affect the preservation of the setting and character of historic towns - o major development proposals likely to affect important heritage assets in a neighbouring authority, e.g. major urban extensions, infrastructure proposals These strategic issues will not necessarily and always be the same as the strategic policies for the protection and enhancement of the historic environment included in a Local Plan but are likely to be a sub-set of them. Indeed local circumstances may indicate that strategic approaches may not always be needed. The sustainability appraisal scoping report should help to identify what is important for a particular plan area.	The Council will continue to work with the Liverpool City Region, its neighbours and its other Duty to Cooperate authorities and bodies, this will include giving consideration to any cross boundary heritage issues.
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S094 Emily Hrycan Historic England S094/2/004 CHAP 13 Site Allocations	Site Allocations Before allocating any site there would need to be some evaluation of the impact, which the development might have upon those elements that contribute to the significance of a heritage asset including their setting, through undertaking a heritage impact assessment. The assessment of the sites needs to address the central issue of whether or not the principle of development and loss of any open space is acceptable. It needs to evaluate: 1. What contribution the site in its current form makes to those elements which contribute to the significance of the heritage assets. 2. What impact the loss of the area and its subsequent development might have upon those elements which contribute to the significance of those heritage assets. 3. If it is likely to result in harm, how might that harm be removed or reduced to an acceptable level. 4. If the harm cannot be reduced or removed, what are the public benefits that outweigh the presumption in favour of the conservation of the heritage asset? The selection of sites for development needs to be informed by an up-to-date evidence base and the Plan should avoid allocating those sites which are likely to result in harm to the significance of the heritage assets of the Plan area. Where adverse impacts are unavoidable, the Plan should consider how any harm might be mitigated. This could include measures such as a reduction of the quantum of development at a site, amending the types of development proposed or locating the development within another part of the site allocation. Such initiatives need to be fully justified and evidenced to ensure that such measures are successful in reducing identified harm.	The heritage impact will be assessed through the Site Assessment process, initially in a light touch fashion, with more detailed assessment given along the lines proposed by Historic England as the sites have moved closer to proposed allocation. The Council have also considered the potential for mitigation as appropriate.
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S096 Steve Sayce Environment Agency S096/1/001 QUEST 4.1 Evidence Base	With regards of matters within our remit, no, however the Council needs to be sure the Level 1 and Level 2 Strategic Flood Risk Assessments are up to date in order to accurately inform allocations, mitigation and / or infrastructure requirements thereby providing a sound evidence base. We draw attention to new flood risk guidance which has updated climate change allowances.	The Council will consider if it is necessary to update the Flood Risk Assessments, particularly in relation to the Site Allocations.
S096 Steve Sayce Environment Agency S096/1/002 QUEST 8.2 Connectivity and Infrastructure	Infrastructure provision can be expensive requiring significant investment. It can be spatially extensive and time consuming to deliver (e.g., flood defences). These issues may need consideration prior to development coming forward to ensure they are economically and environmentally deliverable. It should be noted some infrastructure providers may be unable to finance significant infrastructure schemes by themselves and will likely require partnership funding or developer contributions.	This comment is acknowledged. The Council will continue to work closely with the Environment Agency and other key stakeholders and infrastructure providers during the preparation of the Halton Local Plan.
S096 Steve Sayce Environment Agency S096/1/003 CHAP 8.8 Connectivity and Infrastructure	To clarify, following the implementation of the Flood and Water Management Act 2010 the Environment Agency retains a general strategic overview of flood risk, however at a specific level it passed responsibility for ordinary watercourses and surface and ground water flooding to the Lead Local Flood Authorities. As such it should be considered that the responsibility of flood prevention falls between a numbers of organisations, not just the Environment Agency.	This comment is noted and appropriate amendments to any wording in relation to flood prevention will be made.
S096 Steve Sayce Environment Agency S096/1/004 QUEST 10.1 Halton's Environment	We concur with the issues and challenges identified, especially flood risk, water pollution, air pollution and land contamination. In terms of water quality, this needs to go beyond the scope of the River Mersey looking also at inland rivers, such as Ditton Brook, Keckwick brook etc and the issues each of these face (e.g. diffuse pollution and upstream infrastructure pollution). The North West River Basin Management Plan provides the evidence base.	The Council will ensure that consideration of the water quality of inland rivers such as Ditton Brook, Keckwick Brook and others are given appropriate regard in the preparation of the Local Plan

S096 Steve Sayce Environment Agency S096/1/005 QUEST 10.3 Halton's Environment	We believe these are relevant Core Strategy policies in relation to Halton's environment.	This comment is noted.
S096 Steve Sayce Environment Agency S096/1/006 QUEST 10.4 Halton's Environment	The identified policies should be retained and enhanced to consider the Water Framework Directive, having regard to the North West River Basin Management Plan. This is because local councils have a statutory duty to ensure development does not jeopardise the attainment of 'Good' status under the Water Framework Directive and as set out in the River Basin Management Plan. We suggest policy HE3 be expanded in scope and state the need to prevent deterioration and achieve long term objectives for the Water Framework Directive, as set out in the North West River Basin Management Plan. It might be beneficial to include a definition of 'water way' for policy HE3 so it is clear what features this policy applies to.	The Council has given consideration to these comments in the drafting of Policy HE3 'Halton's Waterways and Waterfronts'.
S096 Steve Sayce Environment Agency S096/1/007 QUEST 11.4 Sustainable Development in Halton	We consider the policies should be retained, specifically SD4 and SD9.	This comment is noted. These policies are now GR1: Design of Development and GR5: Renewable and Low Carbon Energy.
S096 Steve Sayce Environment Agency S096/1/008 QUEST 13.1 Site Allocations	The suggested presentation for Site Allocations would appear appropriate. It should be noted flood risk may require infrastructure to mitigate / protect new site allocations to ensure they are deliverable. Also any allocation will need to be subject to the flood risk sequential and / or exception test(s).	These comments are noted and have been taken into consideration when assessing sites for allocation.

Appendix C: Draft Publication of the Delivery and Allocations Local Plan (2018)