

Sefton Council



**Bootle Area Action Plan**  
**Environmental and Climate Change**  
**Topic Paper**

## 1. Introduction and purpose

1.1 This is the Environment and Climate Change Topic Paper. It is one of a number of topic papers produced to support the examination of the Bootle Area Action Plan (AAP). This topic paper sets out the national, regional and local planning context for the environment and climate change, justifies the policy approach and considers comments received during consultation on the Publication Draft Plan.

1.2 Climate change<sup>1</sup> is generally accepted to be happening globally: a long-term warming of global temperature ('global warming') caused mainly by human activities over many decades which have release 'greenhouse' gases such as carbon dioxide, methane and nitrous monoxide into the air – notably through the burning of fossil (carbon-based) fuels for energy for heating buildings, extraction and industrial processes and for transport, but also through deforestation and changes to farming and land management practices. Once in the atmosphere, these greenhouse gases form a 'blanket' around the planet, acting like a greenhouse does in a garden to trap the heat from the sun and cause the earth to heat up. At a global level this in turn has led to increases in greenhouse gas concentrations in the atmosphere, global air/surface temperatures and ocean temperatures, melting of polar sea ice and glaciers and sea level rise.

1.3 In Bootle and Sefton as a whole, the anticipated climate changes are considered to be warmer, drier summers and milder, wetter winters; more extreme weather, including more intense rainfall, more high winds and more incidences of extreme summer heatwaves; and rising sea levels. The main impacts are considered to be increased risk of flooding from surface water, rivers, the sea and other sources of flood risk, sea level rise over time, increased risk of coastal erosion particularly in extreme weather events, increased likelihood of storm damage and detrimental impacts on species and habitats in Sefton. All of these will have environmental, economic and social impacts for Sefton, not least the mental and physical health impacts of responding to crises, which will be greater for vulnerable groups.

1.4 It is generally accepted that the effects of climate change can be mitigated (that is, the effects slowed down or reduced) firstly by reducing resource and energy use and emissions, from vehicles, buildings and extraction and production processes, including through energy efficiency. Secondly by moving from fossil fuels such as coal, gas, oil and petrol towards renewable energy sources such as wind and tidal power, solar/photovoltaic panels, ground source heat pumps and electricity especially that generated from such sources. The impacts of climate change can also be mitigated by greater re-use and recycling of resources and waste. This includes land and buildings.

1.5 There are also generally accepted adaptations to climate change that reduce harm to people and the environment and make the impacts of climate change easier to deal with. These include trees and planting which can provide shade and shelter and together with greenspaces and water can reduce air temperatures and/or air pollution locally, provide flood storage, homes for nature, and reduce the volume and rate of surface water run-off. This is often referred to as green infrastructure or green and blue infrastructure. As well as these climate change benefits, such green and blue infrastructure also provides health, nature, recreation, quality of life and a range of other benefits and functions. Its provision is a fundamental part of good design.

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<sup>1</sup> See for example <https://www.sefton.gov.uk/environment/energy-and-environment/climate-emergency/climate-emergency/what-is-climate-change/>, <https://climate.metoffice.cloud/dashboard.html> and <https://www.metoffice.gov.uk/weather/climate-change/climate-change-in-the-uk>

1.6 Therefore, this topic paper will consider a number of themes related to climate change. For the most part, each of these themes is dealt with by a specific policy within Bootle Area Action Plan, and so the topic paper will be ordered largely in relation to the order of these policies within the Plan. However, some policies such as BAAP1 Design deal with a range of issues/themes, and the Plan's area-based regeneration policies also touch on several of these themes. These themes will be dealt with in turn. Area-based policies will be discussed within the theme if relevant. There is considerable overlap between the issues relating to policies BAAP11 Public Greenspaces and BAAP24 Environmental Improvements, so the topic paper considers these policies and related area-based policies together. The topic paper also considers other 'environmental protection' themes such as pollution and contamination.

### **Bootle Area Action Plan Vision and Objectives**

1.7 The vision for the Bootle Area Action Plan to 2040 and beyond is:

*"Our ambition is for Bootle to be one of the best places in which to grow up in the country. By 2040, a regenerated Bootle will be a place that provides a full range of opportunities to all its residents to live secure, fulfilling, healthy and supported lives whilst addressing key environmental challenges, including pollution and climate change. It will be a place that is open to sustainable business and provide skills, expertise, land, facilities and infrastructure that is attractive to a range of high-quality employers particularly those that would benefit from Bootle's superb locational advantages. Key to Bootle's success will be our children and young people who will have the spaces, opportunities, support and a voice to shape their town for the future."*

1.8 The plan also sets out 15 objectives. The vision and objectives above will be delivered through a range of policies set out in the plan. The plan also sets out a summary of issues which the plan needs to address. Each subsequent section of this topic paper sets out the objectives and 'key issues to be addressed' which are relevant to the theme/ section, and provides an overview of relevant representations made during the Publication Draft consultation.

1.9 Other sections in this report are:

[2. Context \(national, regional and local\)](#)

[3. BAAP1 Design](#)

[4. BAAP2 Best use of resources](#)

[5. BAAP8 Getting Around](#)

[6. BAAP14 Limiting the impact of industry on residents, pollution and contamination](#)

[7. BAAP9 Nature](#)

[8. BAAP11 Public Green Spaces and BAAP24 Environmental Improvements](#)

[9. References](#)

Appendices (separate document)

## 2. Context

### National context

2.1 The key national context for the Environment and Climate Change and plan-making is set by the National Planning Policy Framework (NPPF)<sup>2</sup>. At the time of preparation of this topic paper, the December 2023 version of the NPPF was in force, and so all NPPF paragraph/section references in this topic paper are to this version. The National Planning Policy Framework states that the purpose of the planning system is to contribute to the achievement of sustainable development, through three overarching and inter-related objectives – an economic objective, a social objective and an environmental objective. Paragraph 8 states that the latter is:

*“To protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”.*

2.2 Subsequent sections of the National Planning Policy Framework refer in more detail to aspects of this. These are set out below in terms of the key themes; with the points listed in bullet points and National Planning Policy Framework paragraph numbers shown in brackets afterwards.

#### **Design**

- Section 12 Achieving well-designed and beautiful places
- Developments that will function well and add to the overall quality of the area, are visually attractive, sympathetic to local character and history, establish or maintain a strong sense of place, optimise the potential of sites to accommodate and sustain an appropriate amount and mix of development and infrastructure and create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users and do not undermine the quality of life or community cohesion and resilience (135)
- Importance of trees (136)

#### **Flood risk**

- Section 14 Meeting the challenge of climate change, flooding and coastal change
- A risk-based, sequential approach which directs development away from areas at greatest risk of flooding from all sources and avoids inappropriate development in areas at such risk. (165-175)
- Role of sustainable drainage systems (SuDS), flood resistant and resilience measures in achieving this (173, 175)
- Role of green infrastructure in reducing the causes and impacts of flooding (167).

#### **Green and blue infrastructure**

- Section 8 Promoting healthy and safe communities
- Secure healthy, inclusive and safe places and buildings, which enable and support healthy lifestyles, including pedestrian & cycling routes and safe & accessible green infrastructure (96)
- Role of trees, retention of trees and presumption in favour of street trees in new development (136) in design quality and for climate change benefits
- Green infrastructure within new developments as adaptation to impacts of climate change (159) and to improve air quality (192)

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<sup>2</sup> See December 2023 National Planning Policy Framework -

<https://webarchive.nationalarchives.gov.uk/ukgwa/20231228093504/https://www.gov.uk/government/publications/national-planning-policy-framework--2>

### **Built heritage**

- Section 16 Conserving and enhancing the historic environment

### **Energy**

- Sections 9 Promoting sustainable transport, 14 Meeting the challenge of climate change, flooding and coastal change
- Support the transition to a low carbon future in a changing climate through shaping places “*in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure*” (157)
- Supportive approach and recognition of the role of renewable, decentralised and low carbon energy (including retrofit) (160-164)

### **Water**

- Take account of the long-term implications of climate change for water supply (158)

### **Re-use of buildings and construction materials / resource efficiency**

- Section 11 Making effective use of land
- Section 14 Meeting the challenge of climate change, flooding and coastal change
- Promote and support the development of under-utilised and brownfield land and buildings, especially for housing (123, 124, 146)
- Proactively bringing forward land that may be suitable for meeting development needs, including suitable brownfield sites (125)
- Shape place in ways that encourage the reuse of existing resources, including the conversion of existing buildings (157)
- Makes efficient use of land, taking into account factors including density (128)
- Higher densities in city and town centres and other locations that are well served by public transport (108, 112)
- The role of higher densities appropriate to the area in securing efficient use of land, with design guides, codes and masterplans helping to achieve this while also a securing high-quality design and environment (128-130).

### **Transport**

- Section 9 Promoting sustainable transport
- Need to assess environmental impacts of traffic and transport infrastructure, avoid and mitigate for adverse effects and seek net environmental gains (108)
- Actively manage patterns of growth to achieve sustainable objectives, including reducing emissions and improving air quality and public health (109)
- Attractive and well-designed walking and cycling networks (108) and cycle parking, public transport and reduction and management of vehicle use (109, 110), recognising the climate change and other benefits of reduced transport emissions
- Promote provision of space and infrastructure for plug-in and low emissions vehicles (111)

### **Pollution and contamination**

- Section 15 Conserving and enhancing the natural environment
- Prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution (180)
- Development to be appropriate for its location; manage and mitigate the effects of pollution on health, living conditions and the natural environment, as well site and area sensitivities to pollution, including noise and light pollution (191)

- Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate (180)
- Make sure that sites are suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination (189)
- 'Agent of change' principle (193)

#### **Nature**

- Section 15 Conserving and enhancing the natural environment
- Plans and decisions to contribute to and enhance the natural and local environment, including designated sites, reducing impacts on and providing net gains for biodiversity and establishing ecological networks (180, 185, 186)

#### **Public open space and green spaces**

- Enable and support healthy lifestyles, including provision of safe and accessible green infrastructure, sports facilities, allotments and layouts that encourage walking and cycling (96)
- Plan positively for the provision of open spaces (97)
- A network of high-quality open spaces and opportunities for sport and physical activity, with health and well-being, nature and climate change benefits(102)
- Protect and/or enhance open space, playing fields and outdoor sports facilities and public rights of way (103,107).

2.3 In summer 2024 the Government consulted on proposed changes<sup>3</sup> to the National Planning Policy Framework. It is anticipated that, if taken forward, these changes would not significantly affect the national context set out above.

2.4 More detailed, national Planning Practice Guidance<sup>4</sup>, which supports the National Planning Policy Framework, is also relevant. This supports and informs the National Planning Policy Framework, and includes for example guidance on air quality, climate change, contamination and hazardous substances, open space and renewable and low carbon energy. The 2019 National Design Guide<sup>5</sup> also provides key guidance about a range of sustainable design issues including natural, open space, energy use and waste reduction.

2.5 Other national documents, strategies and legislation are also relevant, mostly from the government but also national organisations. Some relate to international initiatives. These are listed in Figure 2 of Bootle Area Action Plan's 2023 Sustainability Appraisal (including Strategic Environmental Assessment) Scoping Report<sup>6</sup>, with weblinks provided. They include, for example, the Government's 25 Year Environment Plan (2018), the Climate Change Act (2008), the UK's Sustainable Development Goals (2021) Clean Growth Strategy (2017), Clean Air Strategy (2019), Road to Zero strategy (2018) and the 2019 National Design Guide. Figure 2 of this sustainability appraisal report also lists the key sustainability aims relevant both to these documents and the national context for this topic paper.

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<sup>3</sup> See <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system>

<sup>4</sup> See <https://www.gov.uk/government/collections/planning-practice-guidance>

<sup>5</sup> See <https://www.gov.uk/government/publications/national-design-guide>

<sup>6</sup> See [https://www.sefton.gov.uk/media/eykherns/05-baap\\_sustainabilityappraisal\\_scopingrpt\\_july2023.pdf](https://www.sefton.gov.uk/media/eykherns/05-baap_sustainabilityappraisal_scopingrpt_july2023.pdf)

2.6 The 2019 National Design Guide<sup>7</sup> sets out 10 principles for good design, each with a number of more detailed measures. Many of these principles and measures relate to the themes relevant to this topic paper. The 10 principles are set out below:

1. Context – enhances the surroundings
2. Identity – Attractive and Distinctive
3. Built form - A coherent pattern of development
4. Movement – Accessible and easy to move round
5. Nature – Enhanced and optimised (measures include N2 Improve and enhance water management, N3 Support rich and varied biodiversity)
6. Public spaces – Safe, social and inclusive
7. Uses – Mixed and integrated
8. Homes and Buildings – Functional, healthy and sustainable
9. Resources – Efficient and resilient (measures are R1 Follow the energy hierarchy, R2 Selection of materials and construction techniques, R3 Maximise resilience)
10. Lifespan – Made to last (measures are L1 Well-managed and maintained, L2 Adaptable to changing needs and evolving technologies, L3 A sense of ownership)

2.7 The National Planning Policy Framework notes in its Glossary that Green infrastructure is “A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity”. More recently, Natural England has published its Green infrastructure Framework<sup>8</sup>, comprising principles, standards, maps, a planning and design guide and supporting tools including good practice and case studies. Natural England recognise similar benefits of green infrastructure in urban and rural environments.

2.8 The role of the Buildings Regulations and the government’s ‘Future Homes’ proposals to amend these is also important<sup>9</sup> for example Approved Documents H (Drainage and Waste Disposal), L (Conservation of fuel and power) and R (Infrastructure for electronic communications).

### Regional context

2.9 Bootle is within Sefton MBC, which is part of the Liverpool City Region (LCR), alongside the other local authorities of Halton, Knowsley, Liverpool, St Helens and Wirral, and the LCR Combined Authority. The LCR Combined Authority is preparing a Spatial Development Strategy<sup>10</sup> for the City Region, looking ahead for at least the next 15 years. It will also identify strategic areas for growth and infrastructure provision. The final Spatial Development Strategy will form part of the ‘development plan’ for the City Region and boroughs within it, alongside Local Plans, Neighbourhood Plans and Bootle Area Action Plan.

2.10 The Spatial Development Strategy must only deal with planning matters that are of strategic importance to the City Region. To meet legal requirements, the Spatial Development Strategy will also need to have regard to the National Planning Policy Framework, health, sustainable development, climate change and its consequences and “EU obligations of the UK”. A number of these areas relate particularly to the themes covered by this topic paper. Draft Policy

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<sup>7</sup> See <https://www.gov.uk/government/publications/national-design-guide>

<sup>8</sup> See <https://designatedsites.naturalengland.org.uk/greeninfrastructure/home.aspx>

<sup>9</sup> See Building Regulations Approved Documents <https://www.gov.uk/government/collections/approved-documents> and the government’s ‘Future Homes’ information.

<sup>10</sup> See <https://www.liverpoolcityregion-ca.gov.uk/sds>

LCR SS1 of the emerging SDS identifies an 'Inner Urban Area' in which Bootle (and the AAP area) lies. This area is to provide a focus for sustainable regeneration, benefitting from its proximity to Liverpool City Centre and complementing the wider city region.

2.11 The LCR Combined Authority declared a climate emergency in June 2019<sup>11</sup>, focussing on low carbon energy such as tidal power, hydrogen and offshore wind in Liverpool Bay by 2032. There is also an ongoing recognition of the importance of carbon reduction<sup>12</sup> and improving air quality, and ongoing commitment in the LCR 'Interim Transport Plan' (2019), emerging revised Local Transport Plan and supporting documents to low carbon means of travel<sup>13</sup>.

2.12 The Combined Authority is also the 'responsible authority' for the preparation of the LCR Local Nature Recovery Strategy, working closely with Sefton Council and other 'supporting authorities'. The emerging Local Nature Recovery Strategy<sup>14</sup> seeks to map the city region's most valuable existing habitats (which are almost all outside the plan area) and agree priorities for reversing the decline in biodiversity, setting our species and habitat priorities and identifying areas with potential for biodiversity enhancement. The emerging Local Nature Recovery Strategy will help set a strategic context for nature and green and blue infrastructure enhancement in Bootle.

2.13 Other regional documents, strategies and legislation are also relevant, mostly from national or regional organisations. These are listed in Figure 2 of Bootle Area Action Plan's 2023 Sustainability Appraisal (including Strategic Environmental Assessment) Scoping Report<sup>15</sup>, with weblinks provided. They include, for example, United Utilities' emerging Drainage and Wastewater Management Plan and Merseyside and Halton Joint Waste Plan (2013). Figure 2 of this sustainability appraisal report also lists the key sustainability aims relevant both to these documents and the regional context for this topic paper.

## Local context

### Sefton Local Plan

2.14 Many of the policies the 2017 Sefton Local Plan<sup>16</sup> will remain in force in the Area Action Plan area. Those which will be supplemented or superseded are set out in Appendix A of the Publication Draft Bootle Area Action Plan. The key Local Plan policies relating to the environment and climate change which remain relevant are:

- SD1 'Presumption in favour of sustainable development' and SD2 'Principles of sustainable development'
- IN1 'Infrastructure and developer contributions'
- HC3 'Residential development and primarily residential areas'
- ED2 'Design'
- EQ4 'Pollution and hazards'
- EQ5 'Air quality'
- EQ6 'Contaminated Land'

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<sup>11</sup> See <https://www.liverpoolcityregion-ca.gov.uk/combined-authority-sets-ambitious-targets-to-tackle-climate-emergency/>

<sup>12</sup> See for example documents available via <https://www.liverpoolcityregion-ca.gov.uk/policy-documents#Energy & Environment,such> as the such as the 2022/23 Pathway to NetZero Report.

<sup>13</sup> See <https://www.liverpoolcityregion-ca.gov.uk/wp-content/uploads/LCRCA-TRANSPORT-PLAN.pdf> , <https://www.liverpoolcityregion-ca.gov.uk/combined-authority-sets-ambitious-targets-to-tackle-climate-emergency/>

<sup>14</sup> See <https://www.liverpoolcityregion-ca.gov.uk/local-nature-recovery-strategy>

<sup>15</sup> See link to Examination Library from [www.sefton.gov.uk/bootleap](http://www.sefton.gov.uk/bootleap)

<sup>16</sup> See [www.sefton.gov.uk/localplan](http://www.sefton.gov.uk/localplan)



- EQ8 'Flood risk and surface water'
- EQ10 'Food and Drink'
- EQ11 'Advertisements'
- NH1 Natural assets
- NH2 'Nature'
- NH8 'Minerals'
- Heritage policies NH9 Heritage assets, NH10 Demolition or substantial harm to Designated Heritage Assets, NH11 Works affecting Listed Buildings, NH12 Conservation Areas, NH13 Registered Parks and Gardens, NH14 Schedules Monuments and non-designated archaeology and NH15 Non-designated heritage assets.

2.15 Parts of the following Local Plan policies relating to the environment and climate change also remain relevant:

- EQ9 'Provision of public open space, strategic paths and trees'
- NH5 'Protection of open space and Countryside Recreation Areas'

### **Other**

2.16 Sefton Council declared a climate emergency in June 2019<sup>17</sup> aiming to achieve net zero by 2030. The focus of this declaration is the Council's own activities and energy use, including making the Council's activities net-zero carbon by 2030 (100% clean energy across the Council's full range of functions) and making sure that all strategic decisions are in line with this zero carbon shift.

2.17 Other Council or Local Documents are also relevant, as listed in Figure 2 of Bootle Area Action Plan's 2023 Sustainability Appraisal (including Strategic Environmental Assessment) Scoping Report<sup>18</sup>, with weblinks provided. They include, for example, Sefton Council's Vision and Core Purpose, the Sefton Street Design Guide Highways Developers' Pack (2020), and Supplementary Planning Documents/ Guidance and Information Notes providing more detail in support of Local Plan policies.

2.18. The fact that the plan area is a deprived area nationally is also a relevant part of the context to this Topic Paper and the plan as a whole. Bootle is one of the most deprived parts of Sefton, as well as nationally, according to national Indices of Multiple Deprivation<sup>19</sup> mapping, as illustrated in Appendix 2. Deprivation is particularly marked in relation to income, health and disability, and to a lesser extent, living environment. Public greenspace and green and blue infrastructure in the plan area provides health and well-being benefits to a relatively deprived area. In practice this means that many Bootle residents do not have the income or health to travel far to green or blue spaces and accessible nature spaces elsewhere, including for example at the Sefton Coast or further afield. Car ownership is relatively low in the AAP area for example. In this context the quantity and quality of and especially accessibility to public greenspace and green and blue infrastructure in the plan area is critical.

2.19 The early chapters of Bootle Area Action Plan itself also identify a range of wider environment and climate change issues<sup>20</sup>, challenges and objectives for Bootle Area Action Plan. These are discussed in each of the following sections of this document.

<sup>17</sup> See <https://www.sefton.gov.uk/environment/energy-and-environment/climate-emergency/climate-emergency/what-is-the-council-doing/>

<sup>18</sup> See link to Examination Library from [www.sefton.gov.uk/bootleaap](http://www.sefton.gov.uk/bootleaap)

<sup>19</sup> See [English indices of deprivation 2019 - GOV.UK](https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019)

<sup>20</sup> The wider list is set out on pages 19, 21- 22, Publication Draft, see [www.sefton.gov.uk/bootleaap](http://www.sefton.gov.uk/bootleaap)

### 3. BAAP1 Design

Summary of identified issues which the plan seeks to address	
Bootle has to adapt to the challenges of climate change and opportunities to reduce and mitigate the effects of climate change should be addressed.	
Bootle has a good network of parks and open spaces, however more investment would be welcomed to help maintain them. A wider range of facilities and activities in Bootle's parks would make them more attractive to a wider range of residents.	
The regeneration of Bootle should have good design at its heart and should reflect the aspirations of its communities and respect the historic and cultural context.	
The Leeds and Liverpool canal is a major asset in Bootle and has the potential to help regenerate the town.	
As a built-up area Bootle has fewer nature and ecological areas and lower tree cover than other parts of Sefton including those in or near the countryside. Nonetheless, there are opportunities to improve ecological networks in the town	
The regeneration of Bootle should have good design at its heart and should reflect the aspirations of its communities and respect the historic and cultural context.	
Bootle has many heritage assets, some of which are vacant and currently have no long term viable alternative use. However, they are important to retain and can be a driver for regeneration.	
Existing and future communities must be supported by necessary and appropriate infrastructure and services	

Relevant plan objectives	
Obj 10	To protect and enhance green infrastructure and nature as part of a high quality environment for Bootle, including identifying locations for tree planting, landscaping and ecological improvement
Obj 12	To set high standards of design for new buildings, infrastructure and spaces that complement and improve the places that make Bootle special and which help design out crime and anti-social behaviour
Obj 13	To set standards in new development that help the Council respond to the challenge of climate change

#### Design quality /design in general

3.1 Policy BAAP1 and other plan policies seek good design in all development, in line with the National Planning Policy Framework and National Design Guide. The plan recognises that this is about creating places, buildings, or spaces that reflect the best of local character, work well for everyone, promote healthy active lifestyles, look good, last well, and will adapt to the future needs of residents and businesses. The plan also makes clear that Local Plan policy EQ1 'Design' continues to apply to the Area Action Plan area.

3.2 Bootle has many buildings and structures of recognised historic and cultural importance, but also other buildings and structures that are important to local people and may form part of their familial, cultural and social history, for example the canal or key buildings or spaces. This policy encourages developers to consider how their proposals can identify and showcase the best of Bootle's assets in a well-designed and well-regarded place. This is a deprived and

disadvantaged area, and the design principles set out in the National Design Guide and policies EQ1 and BAAP1 can help to achieve healthy lifestyles, improve health outcomes, secure good access to jobs, services and facilities, resource (and utility cost) efficiency and fit for purpose sites and buildings; set within a context with good green and blue infrastructure and all of its functions and benefits.

3.3 High quality and inclusive design applies to all development - from small extensions to the largest schemes. The Council considers that good design is not necessarily more expensive, and that viability issues do not justify lower standards in deprived and disadvantaged areas. Making Bootle's wider environment one which is well regarded is part of achieving sustainable regeneration. Early public engagement is encouraged on all major schemes

### **Flood risk**

3.4 There were a number of representations about this part of policy BAAP1 and other flood risk issues. Notably, United Utilities requested a range of policies or amendments to most site- or area-based policies in Bootle Area Action Plan. These relate mainly to sewer flood risk, surface water flood risk and management, other flooding issues and the need for these issues to be considered from the earliest stage of masterplanning, site and proposal design. They identify the (many) sites in the Plan area with past sewer flooding or modelled sewer flood risk. They also suggest that some (if not all) surface water from The Strand redevelopment (Policy BAAP4 Bootle Town Centre) and BAAP20 Hawthorn Road/Canal Corridor be discharged into the Leeds and Liverpool Canal rather than United Utilities' sewer network.

3.5 Local Plan policy EQ8 'Flood risk and surface water' remains the key policy for flood risk and surface water management and reduction in the plan area, and its requirements continue to apply to all development in Bootle, and indeed the rest of Sefton. The Council would not want to see a fundamentally different approach in Bootle than from the rest of Sefton. Local Plan policy EQ8 seeks to protect new development from the risk of flooding from all sources. It requires development not to increase flood risk from any sources within the site or elsewhere, and where possible should reduce the causes and impacts of flooding. It requires minimum floor levels in relation to flood risks. Policy EQ8 stresses the need for development proposals to incorporate an integrated approach to the management of flood risk, surface water and foul drainage.

3.6 Also policy EQ8 sets out detailed requirements for surface water management and use of sustainable drainage systems where practicable, requiring conformity to the discharge hierarchy, naturalistic above ground solutions, a 20% reduction in surface water run-off rates and volumes on previously developed sites and allowance for climate change and likely changes in impermeable area within the site over the lifetime of the development.

3.7 The Council also requires all major development in Sefton (including the Area Action Plan area) to submit a completed sustainable drainage systems (SuDS) Pro Forma<sup>21</sup> as part of the planning applications. This requires detailed information about the site, surface water discharge rates and volumes, types of SuDS to be used, maintenance and other information, and requires climate change and urban creep (likely changes in impermeable area within the site over the lifetime of the development) to be taken into account. This is in line with policy EQ8 and the requirement of paragraph 175 of the National Planning Policy Framework. The SuDS Pro Forma

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<sup>21</sup> See [https://www.sefton.gov.uk/media/7382/final\\_sefton\\_suds\\_pro-forma\\_1\\_web.pdf](https://www.sefton.gov.uk/media/7382/final_sefton_suds_pro-forma_1_web.pdf)

aims to make the applicant demonstrate that a sustainable surface water drainage strategy can be achieved.

3.8 One of the conclusions of the Strategic Flood Risk Assessment (SFRA) which accompanies Bootle AAP is that:

*“4.16 In practice, cumulative assessment of the impact of development on flood risk within Bootle Area Action Plan area should focus on surface water flood risk, groundwater emergence and site suitability for sustainable drainage systems and sewer flood risk, particularly on sites where United Utilities have indicated a risk”.*

3.9 This is partly in recognition that surface water flood risk is considerable in Bootle, and that as the town is reliant on combined sewers, management of surface water may have greater implications for sewer flood risk than if the plan area had separate foul and surface water systems. It should also be noted that surface water flood risk is more extensive across the whole of Sefton (including the plan area) than in many other local authority areas, and that this includes areas of low, medium and high surface water flood risk. There are also implications arising from the suitability of parts of the plan area and sites for sustainable drainage systems. Another conclusion of the SFRA is that:

*“4.14 The 2013 SFRA included mapping showing indicative suitability for sustainable drainage systems (SuDS). Suitability varies across the Bootle Area Action Plan area. The area of very low suitability links to the groundwater emergence zone. There are areas of low indicative suitability, mainly to the east and south of this. The rest of the plan area has is high indicative suitability, with a small area of southern Bootle having very high suitability. However, it must be recognised that in an already heavily built-up area, parts of which have a legacy of contaminated land, pockets of opportunities for surface water to infiltrate into the ground may be relatively limited on some sites”.*

3.10 Rather than repeating Local Plan policy EQ8, its tenets or national planning policy and guidance, part 9 of policy BAAP1 ‘Design’ focuses on the need to reduce surface water run-off rates and volumes and other sources of flood risk within the context of helping mitigate and adapt to the impact of climate change. It also recognises the role of green and blue infrastructure in both responding to climate change and contributing to and integral with flood risk and surface water management.

3.11 The Council is also aware of the emphasis given to sustainable drainage systems and flood risk in the National Planning Policy Framework, national planning practice guidance, Defra’s Technical Standards (which do not include any requirements for reduction of surface water rates and volumes on brownfield sites) and the National Design Guide (especially in relation to the ‘Nature’ and ‘Resources’ principles).

3.12 In response largely to representations made by United Utilities during the public consultation on the Preferred Options, the Council introduced what is now paragraph 5.10 of the explanation to this policy.

3.13 As above, a Strategic Flood Risk Assessment and also a Sequential & Exception Test Assessment were prepared for the Bootle Area Action Plan. They are, as they state, set firmly within the regeneration context of the plan area. Many of the sites are brownfield (previously developed) sites, including those which have been derelict, vacant or underused for varying periods of time. Some housing and employment sites also have planning permission and

construction is underway. As such there are no reasonably available alternative sites within the plan area at a lower risk of flooding.

3.14 The Council considers that quantum of development set out in the Bootle Action Area Plan will not be significantly different from that set out for the area in the Sefton Local Plan. Many of the allocations and designations set out in the Local Plan are carried forward into the Bootle Area Action Plan and/or could be developed for their intended purpose using the Local Plan.

3.15 The recommendations of the Strategic Flood Risk Assessment (SFRA) and Sequential & Exception Test Assessment reflect this and many of the concerns expressed by United Utilities at both Preferred Options and Publication Draft stages (United Utilities' Preferred Options comments form an Appendix to the SFRA). For example, some of the seven Recommendations of the SFRA are that:

1. *"This SFRA Overview Update for Bootle Area Action Plan informs the preparation of Bootle Area Action Plan, and informs and complements its Sequential Test and Exception Test Assessment.*
2. *For all of the 22 development sites in the Bootle Area Action Plan, careful assessment and consideration of flood risk issues must be made at the detailed design, masterplanning and drainage details stages for surface water flood risk, sewer, groundwater, and, where relevant canal flood risks; currently and taking account of climate change and 'urban creep'.*
3. *Developers must recognise that these considerations and mitigation of flood risk could affect the developable area of the site, quantum of development and the detailed design of proposals".*  
.....
5. *"Recommendations 2-4 must be reflected in submitted SuDS/ Drainage Pro Forms and Site-specific Flood Risk Assessments. These must be submitted for development on all 22 (re)development sites. This should also be reflected in Site-Specific Flood Risk Assessments for other sites. Development proposals must be able to show that the surface water provisions of Local Plan policy EQ8 'Flood Risk and Surface Water' have been met, including, where reasonably practicable, securing a 20% reduction in surface water run-off rates and volumes".*

3.16 Recommendations 1, 3 and 5 are also within the 4 recommendations of the Sequential & Exception Test Assessment.

3.17 The Council considers that Local Plan policy EQ8 and its explanation, part 9 of Bootle Area Action Plan policy BAAP1 Design and paragraph 5.10 of its explanation and the SuDS Pro Forma require detailed consideration of surface water and other flood risk for sites within the Plan area, and state this may affect developable area of the site, quantum of development and the detailed design of proposals. The SFRA and Sequential & Exception Test and their recommendations reflect this.

3.18 However, the Council would accept that this is not made as clear in policy (or explanation) wording as United Utilities would want, especially as United Utilities considers that sewer flood

risk affects or may affect in future many of the sites within the Plan area. If the Inspector is so minded, the Council would accept the following Proposed Modifications:

**Amendments to the wording of part 9 of policy BAAP1 so that it reads:**

*9. Development proposals should help mitigate and adapt to the impact of climate change including taking appropriate opportunities to introduce, protect and enhance green and blue infrastructure, soft landscaping and biodiversity, **prioritise use of above ground, natural sustainable drainage system features** and reduce surface water run-off rates and volumes and other sources of flood risk. **Development proposals will need careful consideration of drainage, surface water, sewer and other flood risks and their management and mitigation at the detailed design, masterplanning and drainage details stages as these may affect the developable area of the site and the detail of design and layout.***

**Amendments to the wording of paragraph 5.10 of the explanation, so that it reads:**

*"5.10 Surface water ~~flood risk, run-off, and surface water~~, sewer **flood risk** and to a lesser extent groundwater and canal flood risk **(indicated in the Strategic Flood Risk Assessment)** are issues in certain parts of Bootle, including on ~~many~~ **some** housing and employment sites and Regeneration Opportunity and other areas. Development proposals for these sites will need careful consideration of these **drainage**, surface water and other flood risk issues at **each** stages ~~for the site. It should be noted that~~ **as** management and mitigation of these risks may affect the developable area of the sites and the detail of design and layout. **This includes surface water management, rates and volumes, exceedance flow paths from existing and proposed drainage systems, finished floor and ground levels; and for sewers also matters such as the point of connection, whether the proposal will be gravity or pumped, whether changes to public sewers are likely to be acceptable and mitigating measures for any sewer surcharge risks. Developers should engage with United Utilities, the Lead Local Flood Authority and where appropriate the Canal and River Trust from an early stage.***

***5.10A** This should be reflected in submitted SuDS/ Drainage Pro Forms and Site-specific Flood Risk Assessments **and the overall design and layout of development, including green and blue infrastructure.** ~~Development P~~ proposals on these sites must be able to show that the provisions of Local Plan policy EQ8 'Flood Risk and Surface Water' **and the National Planning Policy Framework** have been met, including, where reasonably practicable, securing a 20% reduction in surface water run-off rates and volumes. **Above ground, natural drainage features for SuDS, landscaping, green and blue infrastructure and public realm measures could include new or retrofit permeable surfacing, bio retention tree pits / landscaping, rain gardens, soakaways and filter drainage, swales, green roofs and grey water recycling.***

### **Green and blue infrastructure**

3.19 Most representations made in relation to this part of the policy were generally supportive of the role and benefits of green and blue infrastructure.

3.20 In part 9 of policy BAAP1 the Council has included for the first time a specific policy reference to green and blue infrastructure as part of the response to climate change. Green and blue infrastructure can help mitigate and adapt to climate change. It has a range of benefits and functions. Paragraph 5.9 of the explanation to the policy refers to many of these benefits and functions, "including nature, recreation, physical and mental health and well-being benefits and

*economic benefits (e.g. improving the image of the area and encouraging inward investment). Green and blue infrastructure helps meet the challenge of climate change, reduce air pollution and air temperatures locally, and helps to reduce and manage surface water run-off ...In such a densely built-up area, it is important that development includes appropriate landscaping and green and blue infrastructure”.*

3.21 The Council considers that this green infrastructure may, or in many cases should, include street trees, landscaping, open, green spaces, green roofs and ‘living walls’. In the context of sustainable drainage schemes for sites, opportunity areas, or highways improvements and retrofits, green infrastructure should also include permeable surfacing, bio-retention tree pits and bio-retention landscaping, rain gardens, retrofitted swales and blue/green roofs. The canal and towpath is an important part of Bootle’s green and blue infrastructure.

3.22 Other Area Action Plan policies also stress the need for green and blue infrastructure, for example “[providing] new quality public realm and improve the existing public realm areas” in part 4 of policy BAAP4 Bootle Town Centre, “More trees and other planting in appropriate areas” in part 3 of policy BAAP8 Getting Around, part 2 of policy BAAP9 Nature, part 1 i of policy BAAP10 Healthy Bootle, “Protecting and securing investment in existing public areas, open spaces, parks, playing fields and the links between them ...” and parts 2 and 3 of policy BAAP11 Public Green Space. Part 1 of policy BAAP14 Limiting the impact of industry on residents seeks to protect “loss of trees, vegetation or valued green spaces, particularly that which currently screens employment uses from homes” within existing employment areas. It is also relevant to the opportunity area policies referred to in policies BAAP20-23.

3.23 Although this is not explicit, many of the environmental improvements proposed in policy BAAP24 (notably part 5) of the same name seek also to protect and enhance Bootle’s green and blue infrastructure.

3.24 The importance, role, functions and benefits of green and blue infrastructure in Bootle is in line with the emphasis given in the National Planning Policy Framework, National Design Guide (especially in relation to the ‘Nature’, ‘Homes and Buildings’ and ‘Resources’ (maximise resilience) principles) and other national initiatives such as Natural England’s Green Infrastructure Framework.

### **Built heritage**

3.25 Local Plan heritage policies (NH9 – NH15, see section 2) continue to form the key local planning policy framework for protection of built heritage in Bootle, Derby Park as a Registered Parks and Gardens and non-designated heritage assets. However, a number of policies in Bootle Area Action Plan stress the importance of retaining and seeking new uses for Sefton’s designated heritage assets and other assets of heritage or cultural importance. These include policy BAAP1 Design (notably regarding the canal corridor), BAAP6 Civic and Education Quarter (Bootle Town Hall complex) and BAAP21 Bootle Village.

3.26 Any relevant representations made on the Publication Draft policies were mostly supportive, with a Sefton resident being strongly in favour of retaining Bootle’s traditional vernacular architecture.

3.27 The Council considers that Bootle Area Action Plan, together with the Local Plan, sets out an appropriate framework to protect Bootle’s heritage.

## 4. BAAP2 Best use of resources

Summary of identified issues which the plan seeks to address	
Bootle has to adapt to the challenges of climate change and opportunities to reduce and mitigate the effects of climate change should be addressed.	
Bootle has many heritage assets, some of which are vacant and currently have no long term viable alternative use. However, they are important to retain and can be a driver for regeneration.	

Relevant plan objectives	
Obj 2	To ensure new buildings are resource efficient to help reduce running costs and especially fuel poverty and to support the retrofitting of existing homes and buildings with energy efficiency measures
Obj 9	To bring back into beneficial use vacant land, homes, and buildings
Obj 13	To set standards in new development that help the Council respond to the challenge of climate change
Obj 14	To identify, protect and, where appropriate, find suitable viable uses for Bootle's valued built heritage.

### Energy

4.1 Part 1 of policy BAAP2 deals with energy requirements for major development. A number of representations made to the welcome or support this. The Home Builders Federation do not consider the policy as a whole to be sound and feel that the Council should recognise the decarbonisation of the national grid and the 'Future Homes' proposed changes to Building Regulations which will mean that after 2025 homes will be 'zero carbon ready' with the potential to function as zero carbon homes. They ask that the Council is flexible in implementing any local policy.

4.2 The Council recognises the fundamental need to reduce energy use by occupiers of new development, in line with its Climate Emergency declaration and action, that of Liverpool City Region and national policy including the National Design Guide<sup>22</sup>.

4.3 The Council considers that this is set out well, in more detail, in relation to the 'Resources' principle of the National Design Guide (NDG). The Council would anticipate that developers should take account of this in their designs, to help achieve the requirements of part 1 of policy BAAP2 The Resources principle of the NDG states that well-designed places and buildings should "R1 Follow the energy hierarchy" in terms of:

*"138 Well-designed places and buildings follow the energy hierarchy of:*

- *reducing the need for energy through passive measures including form, orientation and fabric;*
- *using energy efficient mechanical and electrical systems, including heat pumps, heat recovery and LED lights; and*
- *maximising renewable energy especially through decentralised sources, including on-site generation and community-led initiatives.*

<sup>22</sup> See 'context' section for more information.



*139 They maximise the contributions of natural resources such as sun, ground, wind, and vegetation.*

*140 They make use of potential for renewable energy infrastructures at neighbourhood and building level. These include photovoltaic arrays, heat pumps and district heating systems, to reduce demand for non-sustainable energy sources. IT advances and app-based solutions allow users to take ownership or to manage these systems so as to use them most efficiently.*

*141 They follow the principles of whole life carbon assessment and the circular economy, reducing embodied carbon and waste and maximising reuse and recycling.*

*142 Good developments minimise the cost of running buildings and are easy and affordable for occupants to use and manage”.*

4.4 The Council has not set out more prescriptive policy requirements for energy in part because it is set out in the NDG, because opportunities vary from site to site and because the national context, requirements and expectations are still changing and there are no widely accepted, easy-to-follow detailed ‘best practice’ methodologies. The Council considers that part 1 of policy BAAP2 provides developers with sufficient guidance and flexibility on this issue. It is for developers to choose one or more of these means to reduce greenhouse gas emissions, only where practicable.

4.5 Once the national context is more fixed and best practice emerges, the Council could consider whether to provide an Information Note or similar on its expectations in relation to this part of the policy. However, part 5 of the policy requires evidence demonstrating the best of resources to be submitted with all major development proposals. The Council would expect developers, perhaps through their Planning or Design and Access Statements, to set out which of the ways (set out in the policy’s bullet points) they have reduced greenhouses gases and why (if relevant) they could not achieve this the other ways.

### **Water efficiency**

4.6 Part 2 of policy BAAP2 encourages water efficiency for all new build housing, stating that “2. All new build housing developments should aim to be water efficient by seeking to encourage water consumption to fewer than 110 litres per person per day”. This is the usage rate set out in the optional requirement set through Building Regulations Requirement G2: Water Efficiency. Part 1 ix of policy BAAP10 Healthy Bootle seeks to encourage “measures to achieve best use of resources, water efficiency and to maximise energy efficiency (see Policy BAAP2)”. The rationale for this is set out in paragraphs 5.21 and 5.22 of the explanation.

4.7 While the Home Builders Federation do not support part 2 of BAAP2, the LCR Combined Authority and especially United Utilities are very supportive (with reference to their respective representations on the Publication Draft Plan). United Utilities state that it would not incur extra costs and refer to evidence to justify the policy and their views. Indeed, they seek changes to the wording of the policy firstly to make it a requirement, and secondly to ‘future proof’ the standard by referring to the ‘optional requirement or any future updates’.

4.8 The Council welcomes this ‘in principle’ support and evidence from United Utilities submitted as part of this Publication Draft representation and their representations at Preferred Options stage (reproduced in Appendix 3). This reinforces the Council’s belief that this approach is justified. As well as the environmental/resources benefits of reducing use of water which is a scarce resource, the Council considers that this would encourage residents of new homes to use

water efficiently and would have some economic benefits for them. Reducing water use and hence volumes of waste water would also have indirect flood risk benefits by reducing the volume of wastewater entering Bootle's combined sewers. This is also intrinsic to good design, as recognised under 'R3 Maximise resilience' in relation to the 'Resources' principle of the National Design Guide.

4.8 However, the Council accepts that the current wording of the policy which seeks to 'encourage', rather than 'require' water efficiency is imprecise and does not give applicants or decision-makers sufficient certainty. It does not achieve the aims set out in the previous paragraph. Therefore, the Council proposes a change to the wording of part 2 of policy BAAP2 to say:

*"2. All new build housing developments ~~should aim to be water efficient by seeking to encourage water consumption to fewer than~~ must achieve, as a minimum, the requirement of 110 litres per person per day set through the optional Building Regulations Requirement G2: Water Efficiency."*

4.9 While it is accepted that 110 litres per person per day is the current option requirement set through Building Regulations Requirement G2: Water Efficiency, at the current time the Council does not wish to 'future proof' the policy as suggested by United Utilities. That is, the Council does not want to replace the reference to 110 litres per person per day (the current optional standard) simply by a reference to the 'optional standard or any future updates'. The Council would want time to monitor aspects of the implementation of this new policy and new standard before committing to more restrictive future limits. Instead, the Council would want to monitor and assess the ease of implementation of 100 litres per day and use this information to inform the approach in any future review of Bootle Area Action Plan and/or the Local Plan.

#### **Re-use of buildings and construction materials / resource efficiency**

4.9 Part 3 of policy BAAP seeks to reduce carbon emissions by making the most of 'embodied carbon' within existing buildings and structures, and in effect by reducing the need for intensive carbon-generating industrial and other processes which are integral to the production of new building materials. That is, it seeks the re-use and retrofitting of existing buildings in preference to demolition and redevelopment. Where demolition, and indeed construction, takes place Part 4 of policy BAAP2 requires the efficient use of resources, including reducing the volume of waste, recycling and re-using materials, preferably on-site, and management and monitoring procedures to demonstrate this. Part 5 of the policy requires evidence demonstrating the best of resources to be submitted with all major development proposals.

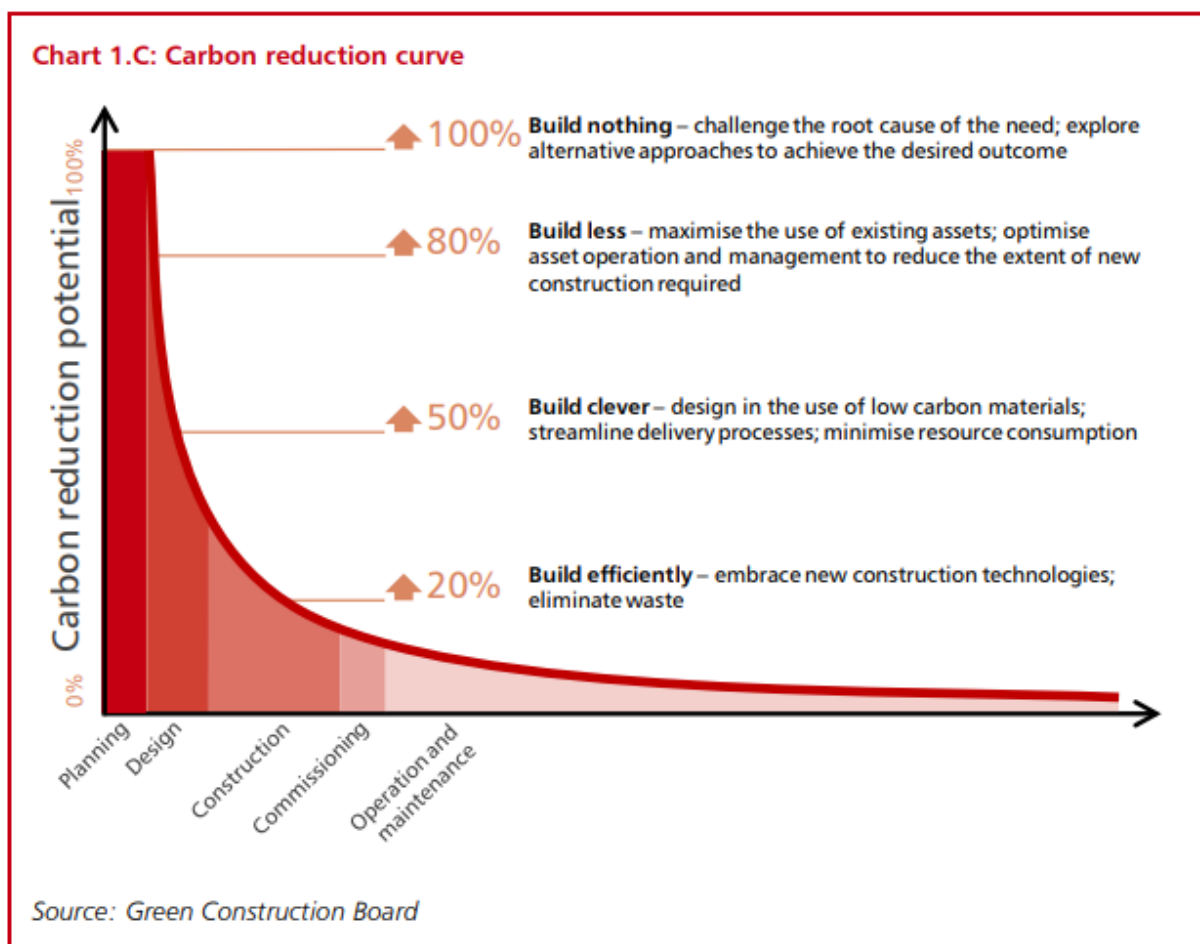
4.10 Other policies in Bootle Area Action Plan also seek to limit demolition and redevelopment, not just in relation to carbon reduction but for other reasons such as the heritage, cultural or economic value of the buildings. These include policy BAAP5 Bootle Office Quarter, BAAP6 Civic and Education Quarter, BAAP7 Local Shopping Parades and BAAP21 Bootle Village.

4.11 There were a number of representations made on the Publication Draft which supported these parts of policy BAAP2 or principles behind it, and thus are broadly supportive of the other policies referred to above. (A Sefton resident objected to parts 3 and 4 because they do not "retain ALL Old Builds ... [which have a] ...rich carbon capacity storage when compared to new builds" and made similar points in relation to the relevant site- or area-based policies).

4.12 The evidence of need for the approach of parts 3 and 4 of policy BAAP2 is set out in a range of national, regional and local strategies, policies and declarations relating to the zero-carbon agenda<sup>23</sup>. Figure 4.1 below<sup>24</sup> provides a useful visual summary of the carbon benefits from part 3 of the policy, and also the emphasis in part 4 of policy BAAP2 of recycling of construction materials (for on-going re-use in construction).

4.13 The Council considers its approach to embodied carbon, to securing efficient use of construction/ demolition resources and to reducing waste and maximising recycling is justified, clear, proportionate and effective. It is not feasible to retain every existing building or structure, but nor is it desirable to make demolition and redevelopment the ‘default’ position, not least because of the loss of embodied carbon, additional carbon impacts inherent to the production of construction materials and because of increased waste generally. It is considered that the Plan achieves a suitable balance.

**Figure 4.1 Embodied carbon: The carbon reduction benefits of reducing resource use**



4.14 The Council would expect developers, perhaps through their Planning or Design and Access Statements, to set how they have achieved parts 3 and 4 of the policy and if not, to justify why not (and for part 3, to show why other factors outweigh the meeting of the policy requirement). The Council has not set out more prescriptive policy requirements for ‘whole life’ or embodied carbon assessment in part because the national context, requirements and expectations are still changing

<sup>23</sup> See context section of this document

<sup>24</sup> Figure if taken from page 11 of HM Treasury’s ‘Infrastructure Carbon Review’, November 2013- see [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/260710/infrastructure\\_carbon\\_review\\_251113.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/260710/infrastructure_carbon_review_251113.pdf)

and there are no widely accepted, easy-to-follow detailed 'best practice' methodologies. Once the national context is more fixed and best practice emerges, the Council could consider whether to provide an Information Note or similar on its expectations in relation to these parts of the policy and/or review this through the next Local Plan.

4.15 Also, it should be noted that Local Plan policy HC3 'Residential development and primarily residential areas' remains relevant in the Area Action Plan area. Part 4 of this policy requires new residential development to achieve a minimum density of 30 dwellings per hectare (net developable area), except where site constraints or the provision of infrastructure within the site make this impractical, or where a lower density can be justified having regard to the layout and character of the immediate surrounding area. The Council would expect all housing development in the plan area to achieve, and in many cases significantly exceed, this minimum density. This will also make the most of the land resource within Bootle.

4.16 Issues relating to re-use of under-used, derelict, brownfield and especially contaminated land are discussed briefly in section 6 below.

## 5. BAAP8 Getting around

<b>Summary of identified issues which the plan seeks to address</b>	
Bootle has to adapt to the challenges of climate change and opportunities to reduce and mitigate the effects of climate change should be addressed.	
Poor air quality, particularly linked with Port traffic/ activity, affects some areas of Bootle and leads to poor health and a poor living environment	
Bootle has a good network of public transport links and benefits from easy access by car to the wider area. However, walking and cycling links could be expanded to allow safe and pleasant routes between key services and facilities in and around Bootle.	
Existing and future communities must be supported by necessary and appropriate infrastructure and services	

<b>Relevant plan objectives</b>	
Obj 4	To ensure that existing and future residents have access to a wide range of easily accessible and high-quality services and facilities with all key facilities and services within a short, safe and attractive walk or cycle ride
Obj 5	To make land, premises and infrastructure available for sustainable economic growth that enables Bootle to build upon its excellent location in the city region, on the coast and close to the motorway and rail network.

5.1 Policy BAAP8 sets out the accessibility requirements which new development must meet. The access requirements set out in Local Plan policy EQ2 Design are also relevant. In line with national, regional and local strategies and policy, BAAP8 emphasises reducing transport emissions by encouraging walking and cycling, public transport, low emissions vehicles and associated infrastructure. Parts 2, 3 and 4 of policy BAAP8 refer to Priority Routes as a focus for future investment including access and green and blue infrastructure improvements and environmental improvements as set out in policy BAAP24. Part 5 recognises the continuing reality of road traffic and seeks to provide for traffic movement and off-street and on-street parking for residents.

5.2 Representations made to policy BAAP8 at Publication Draft stage are mainly supportive, including from National Highways, Natural England and the LCR Combined Authority. A Sefton resident considers that rather than reducing the need to travel by car, new services and facilities should include more, free car parking to encourage visitors and economic investment, and there should be free parking for electric vehicles.

5.3 However, the Council considers that this policy, supplemented by Local Plan policy EQ2 Design, is in line with national, regional and local strategies and policy (see section 2 above) . It will achieve accessibility improvements and aims to focus on improving walking and cycling routes.

## 6. BAAP14 Limiting the impact of industry on residents, pollution and contamination

Summary of identified issues which the plan seeks to address
Many of the potential development sites in the Bootle area have high levels of contamination and this could affect the viability of new development and the wider benefits that would be delivered.
Poor air quality, particularly linked with Port traffic/ activity, affects some areas of Bootle and leads to poor health and a poor living environment.
The patchwork of industrial areas that are integrated within the residential areas of Bootle can often cause problems with noise, dust, traffic and odour. They can detract from the local environment, result in poor living conditions, deter investment and depress the value of homes.
Bootle residents suffer from a higher health inequality than other parts of the borough, including higher rates of obesity,
The regeneration of Bootle should have good design at its heart and should reflect the aspirations of its communities and respect the historic and cultural context.

Relevant plan objectives
Obj5 To make land, premises and infrastructure available for sustainable economic growth that enables Bootle to build upon its excellent location in the city region, on the coast and close to the motorway and rail network.
Obj7 To put measures in place to prevent, reduce and mitigate the harm that business and commercial activity can have on residential amenity and quality of life
Obj9 To bring back into beneficial use vacant land, homes, and buildings.

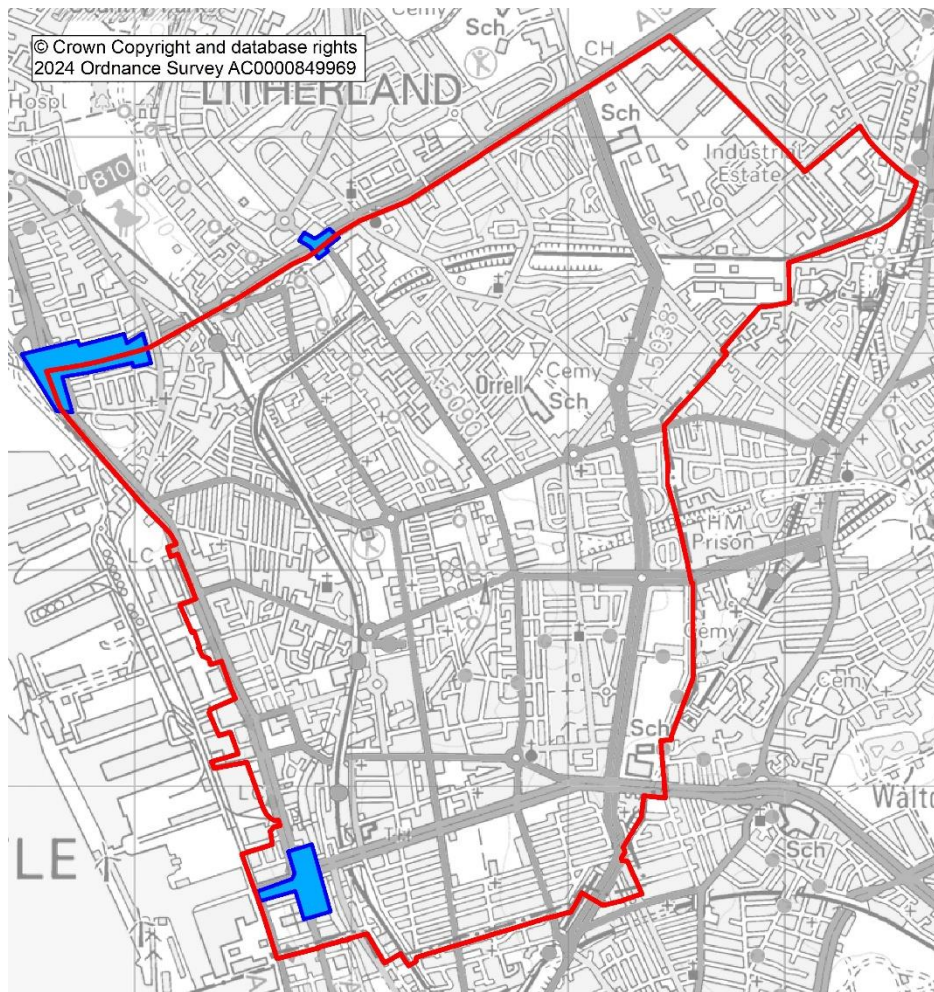
### BAAP14 Limiting the impact of industry on residents

6.1 Within much of the Plan area, industrial sites are integrated within residential areas, which can often cause problems with noise, dust, traffic and odour. They can detract from the local environment, result in poor living conditions, deter investment and depress the value of homes. The Port, too, and its associated activities, such as HGV traffic, has significant environmental impacts, including poor air quality.

6.2 Poor air quality in some parts of the area contributes to respiratory and other health problems for residents. The main concern is nitrogen dioxide and fine particulate emissions from road traffic, including from freight vehicles. The Council has declared four air quality management areas (AQMA's - for which air quality action plans are required) in the parts of Sefton which have poorest air quality. This is due to road traffic emissions. These AQMA's are shown in Figure 6.1. Millers Bridge AQMA is entirely within the Plan area. Two others are partly within it. Sefton's Air Quality Annual Status Report (July 2024)<sup>25</sup> indicates improvements to air quality in recent years.

<sup>25</sup> See <https://www.sefton.gov.uk/media/mbufiyxx/air-quality-status-report-2024.pdf>

**Figure 6.1 Air Quality Management Areas in the Bootle Area Action Plan area**



6.3 The main policy approaches for dealing with contaminated land remains that set out in Sefton Local Plan policies EQ4 'Pollution and hazards', and EQ5 'Air Quality', added to by Bootle Area Action Plan policies BAAP1 Design, BAAP10 Healthy Bootle and BAAP14 Limiting the Impact of Industry on Residents. There are also other national regulations include those required by Part IV of the Environment Act 1995.

6.4 Local Plan policy EQ4 'Pollution and hazards' requires developers to evaluate and take appropriate measures to minimise the risks of adverse impacts to land, water and air pollution, hazardous substances, noise/ vibration, dust, odour, light pollution, including in combination and cumulative effects.

6.5 Part 2 of Policy EQ5 'Air quality' requires major developments to "*incorporate appropriate measures to reduce air pollution and minimise exposure to harmful levels of air pollution to both occupiers of the site and occupiers of neighbouring sites*". Part 1 sets out additional requirements for development in the Air Quality Management Areas (AQMA) (see Figure 6.1), relating to AQMA/ Action Plan objectives and the need to avoid introducing significant new sources of air pollutants, or introducing new development whose users will be especially susceptible to air pollution in AQMA.

6.6 Part 17 of policy BAAP1 Design aims to make sure that development within existing residential areas should protect residential amenity of new and existing residents to avoid any

unacceptable impact on their living conditions. More specifically, Policy BAAP10 Healthy Bootle seeks to improve the quality of life for people in Bootle to make it easier for them to lead healthy, active lifestyles, including by (part x) *“Managing air quality and pollution and restricting new homes and other developments where people spend time in areas with poor environmental quality”*. This part of the policy also refers to Local Plan policies EQ4 and EQ5 as the main mechanisms to achieve this.

6.7 However, there is also a specific Bootle Area Action Plan policy in relation to pollution: Policy BAAP14 Limiting the Impact of Industry on Residents. This seeks to eliminate or mitigate the impacts to nearby residents of increased land/soil, air, water, noise, vibration or light pollutions, traffic and on-street parking, outlook and loss of trees, vegetation or valued green spaces. Part 3 also makes clear that for new residential development proposed next to or close to existing employment or industrial activity, it is the responsibility of the applicant of the residential proposals (as the ‘agent of change’<sup>26</sup>) to make sure there will be no significant adverse impacts on future residents.

6.9 United Utilities comment that part 3 could also apply to uses such as offices, retail or leisure uses, as they may also be seen as sensitive uses in relation to industrial uses such as wastewater treatment works or pumping stations which may generate noise, odour, associated tanker (vehicle) movements and which may attract flies. They request that this part of the policy be amended to reflect this. However, United Utilities also note that *“at the current time, we have not identified any issues associated with the proximity to our wastewater assets”*. The Council considers that as the agent of change issue is set out in the National Planning Policy Framework, and Sefton’s Local Plan policies EQ4 and EQ5 also provide a framework, it is not appropriate to amend part 3 of policy BAAP14. Other representations to the policy sought greater encouragement of tree/hedgerow planting on industrial sites and Priority Route corridors.

6.10 Therefore it is considered that the policy approach to control of pollution including air quality set out in Local Plan policies EQ4 and EQ5 and Bootle Area Action Plan policies BAAP1, BAAP10 and BAAP14 provide a sufficiently robust planning policy framework for the control of pollution in the Plan area.

### **Contaminated land, underused or derelict land and buildings**

6.11 In terms of contaminated land, the LCR Combined Authority commented that the Draft Bootle Area Action Plan presents a good overall strategic fit with emerging Spatial Development Strategy policy, including that of maximising use of brownfield and underutilised land to catalyse urban regeneration, delivering regeneration objectives and helping to address long standing issues of dereliction and land contamination. A Sefton resident suggested that consideration be given to creating new greenspaces on contaminated land and barring the public if contaminated sites are a danger to health.

6.12 Bootle’s industrial past and century of more of urban use and re-use of land and Second World War bomb damage has left large tracts of contaminated and derelict land in areas that have low land values. This is especially the case in the historically industrial areas next to the canal. This legacy requires investment to remediate vacant sites, overcome constraints and make them suitable for new development. Many of these sites are also vacant, under-used or derelict. This

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<sup>26</sup> See paragraph 193 of National Planning Policy Framework, December 2023- see <https://webarchive.nationalarchives.gov.uk/ukgwa/20231228093504/https://www.gov.uk/government/publications/national-planning-policy-framework--2>



applies to most of the housing and employment sites and regeneration opportunity areas allocated in the Plan. However, this has cost implications and so could affect the viability of future development.

6.13 Some sites have been subject to historic infilling or landfill, for example the former railway cutting running east-west from Southport Road to Strand Road. Many sites have seen changes in level from the historic ground level; land raised ('made ground') or levels reduced. This and previous uses this may also relate to land contamination.

6.14 The main policy approach for dealing with contaminated land remains that set out in Local Plan policy EQ6 'Contaminated Land', which requires developers to demonstrate that current and future occupiers and neighbours, controlled water systems, ecological systems or property will not be exposed to harmful levels of contamination. It also requires appropriate remediation where such risks occur. Accordingly, there is no Bootle Area Action Plan policy which deals specifically with the issue of contamination.

6.15 However, Bootle Area Action Plan is explicit about the implications of this contamination for implementation and delivery of a number of housing, employment and other development sites. For example, see paragraphs 5.164 and 5.174 of the Plan in relation to policy BAAP16 Housing Land Provision, part 6 of policy BAAP20 Hawthorne Road/ Canal Corridor and paragraphs 5.213 and 5.215 of its explanation. Here, the Plan is clear that some form of public subsidy would need public subsidy to help them to be delivered in the future. This is in line with the situation over recent decades, where development on contaminated sites which are often also vacant, under-used or derelict has gone ahead in large part due to subsidies from national or regional initiatives such as Derelict Land Grant, the Housing Market Renewal Initiative and more recent Homes England or LCR Combined Authority funding.

6.16 The Plan is also clear (paragraph 5.164) that unless they have planning permission or a likelihood of funding, housing sites which are currently contaminated, vacant, under-used or derelict will not be included in Sefton's 5-year supply of specific deliverable housing sites.

## 7. BAAP9 Nature

<b>Summary of identified issues which the plan seeks to address</b>	
Bootle has to adapt to the challenges of climate change and opportunities to reduce and mitigate the effects of climate change should be addressed.	
As a built-up area Bootle has fewer nature and ecological areas and lower tree cover than other parts of Sefton including those in or near the countryside. Nonetheless, there are opportunities to improve ecological networks in the town.	
The patchwork of industrial areas that are integrated within the residential areas of Bootle can often cause problems with noise, dust, traffic and odour. They can detract from the local environment, result in poor living conditions, deter investment and depress the value of homes.	
The Leeds and Liverpool canal is a major asset in Bootle and has the potential to help regenerate the town.	
Bootle has a good network of parks and open spaces, however more investment would be welcomed to help maintain them. A wider range of facilities and activities in Bootle's parks would make them more attractive to a wider range of residents.	

<b>Relevant plan objectives</b>	
Obj 10	To protect and enhance green infrastructure and nature as part of a high quality environment for Bootle, including identifying locations for tree planting, landscaping and ecological improvements
Obj 12	To set high standards of design for new buildings, infrastructure and spaces that complement and improve the places that make Bootle special and which help design out crime and anti-social behaviour
Obj 13	To set standards in new development that help the Council respond to the challenge of climate change

7.1 Part 1 of the policy refers to mandatory biodiversity net gain. Where proposals are exempt this biodiversity net gain, Part 2 encourages re developers to take opportunities for securing measurable net gains for biodiversity within the site, having regard to the Local Nature Recovery Strategy and with a focus on creating and improving wildlife corridors and 'stepping stones' that connect existing and new areas of biodiversity value in the area. Part 3 refers to the established approach for mitigating and managing recreation pressure on the Sefton Coast, set out in the 2023 Information Note: Managing and mitigating the impact of recreation pressure on the Sefton Coast - Sefton's Interim Approach for housing development<sup>27</sup> in relation to Local Plan policies NH1 'Natural Assets' and NH2 'Nature'.

7.2 The LCR Combined Authority and Natural England support the policy, and the Woodland Trust offer broad support with the caveat that the Council needs to set more information about how part 2 will be implemented. In relation to part 2, a Sefton resident considers that schemes outside the remit of biodiversity net gain and that cannot demonstrably provide greenery should make a contribution towards creation of a new greenspace on sites currently occupied by modern buildings or vacant, derelict or contaminated land.

<sup>27</sup> See [https://www.sefton.gov.uk/media/4485/hrarepressureinforote\\_24-25\\_rates\\_final.pdf](https://www.sefton.gov.uk/media/4485/hrarepressureinforote_24-25_rates_final.pdf)

7.3 In effect, parts 1 and 3 of the policy reiterate existing national and local policy, respectively. Part 2 sets out a new approach, encouraging net biodiversity gains on sites where mandatory biodiversity net gain does not apply, in line with paragraph 180 d of the December 2023 National Planning Policy Framework. As set out in paragraphs 2.28 and 2.30 of the plan, Bootle is entirely urban, and has only limited nature assets or Tree Preservation Orders. There are no statutory designated nature sites, although there is a designated Local Geological Site at Harris Drive and smaller areas of Priority Habitat, for example woodland Priority Habitat in Derby Park and Grassland Habitat along railway embankments. However, some of the internationally and nationally designated sites on the Sefton Coast are not far from the plan area. There are also a number of public greenspaces, and other green and blue infrastructure which have some nature value, benefits and functions.

7.4 Paragraph 5.101 of the explanation to policy BAAP9 reiterates that Bootle does not have the same level of biodiversity and ecological assets as the rest of Sefton and sets out the Council's view that it is important to protect existing areas of ecological value in Bootle, introducing new areas where appropriate within new development.

7.5 The approach to measurement will be more subjective and site-specific than the somewhat formulaic and directive approach set out in Defra's Metrics<sup>28</sup>, which for example emphasises existing habitat type. Bootle has such (relatively) low nature value that measures which may seem unremarkable elsewhere may achieve "measurable" uplift in Bootle. The aim is to bring new naturalistic areas and nature into the densely built-up urban area. This would include nature gains provided as part of wider green and blue infrastructure such as shrubs, trees and planting as part of landscaping, wildflower areas, new trees or various types of sustainable drainage systems (see section 3 above). Also it may include measures to benefit protected or priority species such as hedgehogs or bats, or birds, for example by providing hedgehog friendly fencing, and bat or bird boxes – these are not covered by the Metrics which deal only with habitats not species.

7.6 It is not considered appropriate to include such potentially detailed information in the Area Action Plan. Instead, it should be included in the revised Nature Supplementary Planning Document which is currently being prepared<sup>29</sup>, and/or in a future Information Note.

7.6 The Local Nature Recovery Strategy (LNRS) for the LCR is still being prepared, and therefore it is not considered appropriate to refer to specific LNRS actions, measures or opportunity areas in the policy or its explanation. However, its emerging draft priorities include watercourses, grassland, woodland and trees and urban habitats. The more relevant emerging draft LNRS Urban Habitat priorities and measures may also help inform the achievement of net gains for biodiversity under part 2 of policy BAAP9.

7.7 Emerging draft LNRS Urban Habitat priorities include:

- More high quality and interconnected urban green and blue infrastructure, designed in collaboration with communities
- Nature at the heart of urban design/ planning, including Biodiversity Net Gain on or close to development sites
- A network of well-managed, valued and interconnected open mosaic habitats on brownfield land, where appropriate

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<sup>28</sup> See <https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>

<sup>29</sup> See [www.sefton.gov.uk/newsdpd](http://www.sefton.gov.uk/newsdpd) and [nature-conservation-update.pdf](#)

- A region-wide co-ordinated network of functional nature corridors and greenways for urban wildlife.

7.8 Emerging draft Measures to help achieve these priorities include:

- Use of roadside verges, railways and other linear infrastructure to connect areas of biodiversity and aid movement of key species
- Wildlife-friendly management of existing blue infrastructure such as SuDS and canals
- Planting of climate resilient urban woodland and street trees that provide shade and sources of food for wildlife (ideally locally sourced, native trees such as rowan, hawthorn, crab apple etc)
- Management and retention of brownfield and open mosaic habitat sites where this is in line with local plan policy.

7.9 The Council fully supports on-site biodiversity enhancements and the provision of green and blue infrastructure, including landscaping, trees and sustainable drainage systems within sites, as part of achieving good design and meeting policy requirements (see section 3). However, the creation of new, largescale public greenspace is not considered appropriate in the plan area. The reasons for this are explained in relation to policies BAAP11 and BAAP24 in section 8.

## 8. BAAP11 Public Green Spaces and BAAP24 Environmental Improvements

8.1 There are considerable functional linkages between these policies and representations made to each policy often relate to both, so they will be discussed jointly below.

<b>Summary of identified issues which the plan seeks to address</b>	
	Bootle has to adapt to the challenges of climate change and opportunities to reduce and mitigate the effects of climate change should be addressed.
	As a built-up area Bootle has fewer nature and ecological areas and lower tree cover than other parts of Sefton including those in or near the countryside. Nonetheless, there are opportunities to improve ecological networks in the town.
	Bootle has a good network of parks and open spaces, however more investment would be welcomed to help maintain them. A wider range of facilities and activities in Bootle's parks would make them more attractive to a wider range of residents.
	Bootle has a good network of public transport links and benefits from easy access by car to the wider area. However, walking and cycling links could be expanded to allow safe and pleasant routes between key services and facilities in and around Bootle.
	Bootle residents suffer from a higher health inequality than other parts of the borough, including higher rates of obesity.
	Existing and future communities must be supported by necessary and appropriate infrastructure and services.
	The Leeds and Liverpool canal is a major asset in Bootle and has the potential to help regenerate the town
	Fly-tipping and litter are a concern for many residents and are having a detrimental impact on the attractiveness and perception of Bootle to those who live in and visit the town.
	In order to ensure the future success of Bootle and change perceptions of the town, a more comprehensive and rounded approach to the issues facing the town is necessary.

<b>Relevant plan objectives</b>	
Obj 4	To ensure that existing and future residents have access to a wide range of easily accessible and high-quality services and facilities with all key facilities and services within a short, safe and attractive walk or cycle ride
Obj 10	To protect and enhance green infrastructure and nature as part of a high quality environment for Bootle, including identifying locations for tree planting, landscaping and ecological improvements
Obj 11	To make Bootle a healthier place to live and to provide an environment that enables residents to live a healthier lifestyle
Obj 12	To set high standards of design for new buildings, infrastructure and spaces that complement and improve the places that make Bootle special and which help design out crime and anti-social behaviour
Obj 13	To set standards in new development that help the Council respond to the challenge of climate change
Obj 14	To recognise the needs and potential of children and young people in regeneration and place-making in Bootle

8.2 The representations to the Publication Draft plan from the LCR Combined Authority, Natural England and the Woodland Trust are broadly supportive of policy BAAP11 (and by implication, policy BAAP10 part i). Other representations, from Sport England, the Home Builders Federation and a Sefton resident raise concerns about policies BAAP11 and/or BAAP24 which are discussed below.

### Protection of existing public greenspace

8.3 Part 1 of policy BAAP11 Public Green Spaces seeks to protect existing public greenspaces from development, except that necessary for the continued use and improvement of the site for its existing use, or for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use. These points are similar to those of paragraph 103 of the National Planning Policy Framework, however the third point in this paragraph is not included in policy BAAP11. This is where *“the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location”*.

8.4 Sport England feel that part 1 of policy BAAP11 should align fully to paragraph 103 of the National Planning Policy Framework. The Council considers that it is not generally appropriate for the plan simply to replicate the National Planning Policy Framework, which is already part of the policy framework for making decisions on planning applications or at appeal. There seems to be no purpose or added value in this. Instead, the Council considers that local plan (including Area Action Plan) policy should set local requirements based on local evidence and need. The Council wishes to protect all of the public greenspaces (including pitch sites) in the plan area from development other than that set out in part 1 of policy BAAP11.

8.5 As such, there are no sites identified within the plan area considered to be suitable for such replacement provision for pitches, parks or other public greenspaces, and the Council does not consider that replacement provision outside the plan area would represent equivalent or better provision. Also the Council considers the wording to the first bullet point to be acceptable. Sport England are concerned in relation to the impact on pitches and any future shortfalls, only five of the public greenspaces (Figure 16 of the plan) are publicly available pitch sites; 4 in Council ownership.

8.6 Part 2 of policy BAAP11 seeks to create or improve the links between major development sites and nearby public greenspaces, both within the development and in terms of the Priority Route network. This includes signage. Part 3 of the policy makes clear that *“There is no requirement to provide any new formal public green space areas within new development proposals in the AAP area. Instead, a financial contribution in lieu of public green space will be secured by planning obligation towards environmental enhancements of existing public green spaces”*. Part 4 states that major residential and non-residential development and changes of use to hot food takeaways should *“provide a proportionate contribution to environmental improvements in the local area, in line with Policy BAAP24, which will include investment in its public green spaces”*. Part 1 of policy BAAP24 repeats this, part 2 sets the cost at £2,680 (2024/25 rates) per housing unit, per hot food takeaway and per 100 m<sup>2</sup> of non-residential floorspace and part 2 states that this will be via a planning obligation, offset through providing environmental improvements off-site.

8.7 Part 1i of policy BAAP10 Healthy Bootle also seeks to help maximise opportunities to improve quality of life to make it easier for people in Bootle to lead healthy, active lifestyles, by

*“Protecting and securing investment in existing public areas, open spaces, parks, playing fields and the links between them, encouraging people, particularly children and young people, to take physical exercise by providing opportunities for walking, cycling, outdoor recreation and sport (see Policy BAAP11)”.*

### **New/enhanced public greenspace provision**

8.8 In their representations on the Publication Draft Plan, a Sefton resident seeks creation of new public greenspace, including on vacant, derelict or contaminated land. The Home Builders Federation indicate that there is no clear justification or evidence for either policy. Sport England refer to a lack of clarity regarding contributions to sport and recreation provision and consider that new sports provision should be made in line with the Playing Pitch Calculator.

8.9 Paragraph 97 of the December 2023 National Planning Policy Framework states that policies should *“plan positively for the provision and use of ... open space ...”*. Paragraph 102 refers to the need for robust and up to date assessments of open space, sport and recreation needs and opportunities for new provision, which plans should *“seek to accommodate”*.

8.10 While it is generally accepted that new housing development should enhance recreational public open space provision, Sefton Council has long considered that priority should be given to enhancement of existing parks and open spaces, and accessibility to them, rather than to provision of new public greenspaces, even on previously-contaminated land<sup>30</sup>, as there is broadly good parks accessibility throughout Sefton’s urban areas. Area Action Plan policies reflect this, based mainly on the evidence of current provision in Bootle, including the higher rates of provision of main parks than the rest of Sefton and Bootle’s relatively good parks accessibility to parks, as set out below. This underlies the approach in policies BAAP11 and BAAP24.

8.11 As part of the preparation process for the Bootle Area Action Plan, in 2024 an assessment was carried out of open space provision in Bootle in terms of quantity, quality, and accessibility. In effect this is an update of the 2015 Sefton Open Space and Recreation Study<sup>31</sup>.

8.12 In terms of quantity of provision, this 2024 update found that the plan area has higher rates of provision (hectares per thousand population) of main parks and allotments than all of Bootle & Netherton, and Sefton as a whole (the quantity target), and about the same provision rates of public cemeteries as Sefton as a whole. Bootle has relatively lower provision rates of neighbourhood parks, community parks and water features and, as an urban area, has no Countryside Recreation Areas. Taken together, this means that the provision rates for ‘all parks’ in the plan area are lower than for all of Bootle & Netherton, and Sefton as a whole and accessible nature space provision in Bootle is significantly lower than Sefton as a whole. However, main parks are generally the largest parks, with greatest diversity of facilities and attractions, seen as worth travelling some distance to, highly accessible to all and able to accommodate large numbers of visitors. They have a particularly important recreational role, therefore, and so the relatively high rate of provision of main parks (above the target) in the plan area is relevant and important.

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<sup>30</sup> See for example paragraphs 97 and 102 of the December 2023 National Planning Policy Framework, Sefton Local Plan policy EQ9 'Provision of public open space, strategic paths and trees' of the Sefton Local Plan and the Local Plans of most local authorities in England. Policy DQ4 'Public Greenspace and development' of the now-superseded 2006 Sefton Unitary Development Plan and associated Supplementary Planning Guidance saw the enhancement of public open space in the locality of the development rather than provision of new open space. This approach was discontinued in the 2017 Sefton Local Plan mainly because of the government’s proposed restriction of the pooling of section 106 monies from planning obligations.

<sup>31</sup> See <https://www.sefton.gov.uk/media/2462/openspace-recreation-study-sefton-nov2015.pdf>

8.13 The 2023 Playing Pitch and Open Space Strategy<sup>32</sup> shows that there are five publicly accessible pitch sites in the plan area (three used for football and two for cricket and one only used for baseball) plus three school pitch sites not available for community use. There are three bowling greens in use, and one bowling green. There are no rugby or hockey pitches in the plan area.

8.14 Sefton's open space quality target is based on management to Green Flag standards and number of 'Friends of parks' groups. No parks or open spaces in the plan area achieved Green Flag awards in 2023 (there are 2 elsewhere in Sefton), although in the past North Park and Derby Park have won such awards. However, this may reflect sites not being entered for the awards, rather than failing to meet the required standards. Five parks in the plan area have 'Friends of' groups; these are Bowersdale Park, Derby Park, Mellanear Park, North Park and South Park. These groups demonstrate local pride and engagement. Such parks are more likely to be higher quality or have faster responses to management and maintenance issues arising (such as littering) due in part to the input of 'Friends of' volunteers. In 2023 there were comprehensive quality improvements to Seaforth Green (Seaforth Triangle) and Poets Park, using Levelling Up Funding.

8.15 The plan area performs well when assessed against the Sefton parks accessibility targets. This is illustrated in Appendix 4. Accessibility to main, neighbourhood and community parks in Bootle is the same or better than in other parts of Sefton. The 2024 update shows that all of the Plan's six housing sites and all of the three housing-led regeneration sites are within a 1200 m 'straight-line' distance of a main park, representing 2 km 'on the ground' distance. All of them are within a 600 m 'straight-line' distance of a neighbourhood park, representing 1 km 'on the ground' distance. Most of them are also within 240 m straight-line distance of a community park, representing within 400 m 'on the ground'.

8.16 The focus on enhancing existing assets rather than creating new ones also relates to practical considerations/ evidence such as the Council's effective shortage of funding over recent years to maintain existing public greenspaces, let alone new public greenspaces. As a rule of thumb Sefton Council is not in a position to adopt new public greenspace. An alternative is for developers to use management companies for on-going management and maintenance of public open space provided as part of new development. This relies on on-going contributions from occupiers/owners to these costs, for the lifetime of development. There is some disquiet about such arrangements<sup>33</sup>. As it is a deprived area, these additional on-going management costs (where an alternative approach is practicable) are likely to place a relatively higher burden on Bootle residents. There are also further practical considerations, in that, anecdotally, residents of the wider area tend to contact the Council if there issues with the quality or management or maintenance of such areas; the chain of management responsibility may not be obvious to the community. This may be compounded in areas with relatively high rates of fly-tipping, such as in Bootle.

8.17 While the Council fully supports on-site biodiversity enhancements and the provision of green and blue infrastructure, including landscaping, trees and sustainable drainage systems within sites, as part of achieving good design and meeting policy requirements, the creation of new, largescale public greenspace is not considered appropriate in the plan area. However, as set

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<sup>32</sup> See [sefton\\_pposs\\_strategyactionplan adopted 7-23.pdf](#)

<sup>33</sup> See for example BBC News 1<sup>st</sup> December 2024 'Our estate pays £9,000 a year for grass to be cut': <https://www.bbc.co.uk/news/articles/c978jqvzvlo>



out [below](#) under the heading ‘Commuted sums for environmental improvements (including for public greenspace)’, it is proposed to amend policy BAAP24 and its explanation to recognise that there may be some site-specific circumstances where on-site improvements also may be acceptable as an off-set, where these are substantively over and above normal policy requirements and provide clear benefits to future residents and the wider neighbourhood.

### Playing pitches and outdoor sports provision

8.18 In their representations to policy BAAP24 Sport England suggest that policy BAAP24 (and by implication BAAP11) should seek specific contributions for new or enhanced playing pitches in Bootle in line with the recommendations and settlement priorities of the 2023 Playing Pitch and Outdoor Sports Strategy (POSS). This includes use of Sport England’s Playing Pitch Calculator as the basis for future negotiation for new or enhanced provision. They feel this is important because there are no allocation-specific requirements for sport and recreation.

8.19 Sefton’s Playing Pitch and Outdoor Sports Strategy suggests a relatively nuanced approach to use of Sport England’s Playing Pitch Calculator, with the Council working with Sport England to develop a process and guidance for obtaining developer contributions in any future Local Plan [rather than development plan] review. However, the text also states that *“it should also be recognised that new homes in Sefton provide for the housing needs of the existing population rather than purely for population growth and therefore that the Playing Pitch Calculator alone is too blunt an instrument for Sefton”*<sup>34</sup>.

8.20 The Council’s view is that while monies from housing sites within the plan area could be directed towards the PPOSS settlement priorities in the plan area, in practice, that means that the scope of improvements is relatively limited. This would be to:

- Enhancing maintenance regime on Stuart Road playing fields to help achieve allow greater use of spare capacity on the (currently standard quality) cricket pitch and three (currently poor quality) football pitches
- Make sure Bootle FC has a sinking fund for replacing the surface of the two small sided artificial turf football pitches
- Enhance the quality of the (currently poor quality) single adult and youth pitches at Orrell Mount Park to reduce/alleviate overplay
- Look to re-surface the (poor quality, concrete) tennis court in Derby Park and install Lawn Tennis Association initiatives such as ClubSpark to increase opportunities for year-round recreational tennis

8.21 As above, the Council considers firstly that there is no scope for outdoor sports provision on additional sites in the plan area. Secondly, the scale of improvements to existing sites is relatively limited and it would not be appropriate to require all new housing development in the plan area to provide specifically for this as this could lead to a surplus of monies. Thirdly, using the Playing Pitch Calculator *“as a basis for future negotiation”*, as Sport England suggest, would give insufficient certainty to developers; no more certainty than the approach currently set out in policy BAAP24. Also, football, cricket and tennis form only part of the sport, wider recreation and health needs of the local community. The Council considers that policy BAAP24 provides an effective mechanism for securing the PPOSS and wider recreation, health and environment priorities in the plan area.

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<sup>34</sup> Pages 22, 23, 32, Playing Pitch and Outdoor Sports Strategy, see [sefton\\_poss\\_strategyactionplan\\_adopted\\_7-23.pdf](#)

### Wider environmental improvement priorities (BAAP24)

8.22 Wider recreation in parks or public greenspaces, walking and cycling are also important. Policy BAAP24 allows these sport and recreation needs to be balanced against and prioritised amongst wider environmental needs and priorities in the plan area, with attendant health, economic or other benefits. At the same time both policy BAAP11 and BAAP24 are clear that some or all commuted sums from new housing development should improve public greenspaces (which are mainly parks): *“improving public greenspaces ... with emphasis on facilities, equipment and activities for children and young people”*.

8.23 Internal discussions have taken place within the Council to establish a draft list of potential priorities, including whether projects would be small, medium or large in scale (each with associated resource needs), whether they are entirely new or complement, extend or add value to existing or recent initiatives. An indicative draft list of BAAP24 Environmental Improvement priority projects is set out in Appendix 5. It is not considered to be an effective use of resources to work up and cost detailed schemes at the current time, because of the uncertainties about when (or if) the policy (or an amended version) would come into force, when the first monies might come on stream and how much such monies might be over a rolling three-year period, say. Based on the experience of the last few years, there are also greater uncertainties about the rate of increase of related costs in the future.

8.24 It must be noted and understood that the draft list of priorities in Appendix 5 is indicative and does not in itself demonstrate a corporate commitment to any of the items listed. It is not the role of this Topic Paper to commit the Council to any projects. There are separate, well-established processes and procedures for this, in line with the Council’s constitution. Assuming that the plan and policies BAAP11 and BAAP24 are adopted as proposed (or subject to only minor changes), the Council intends to provide more detailed and costed priorities on a rolling programme, once the plan is adopted and the scale and timing of relevant development and monies are better understood. The Council would intend to carry out public consultation on a draft priorities list.

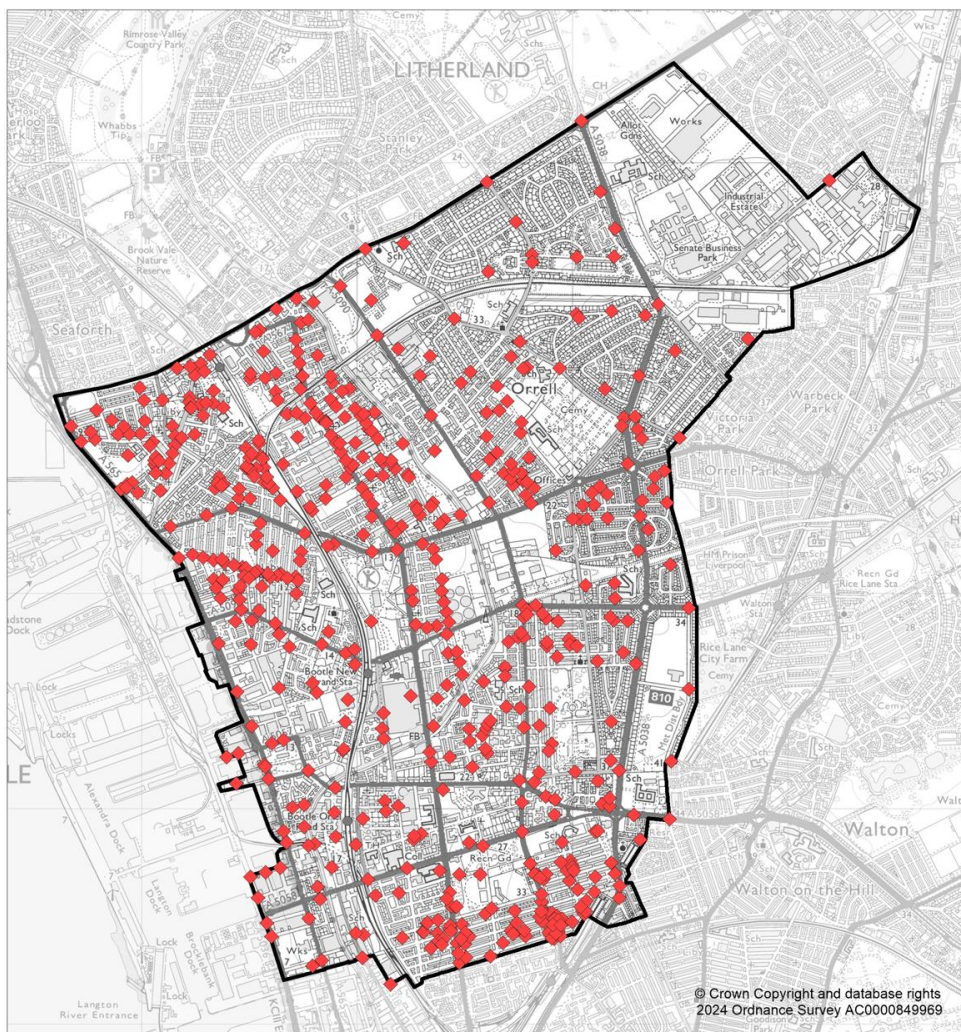
### Justification for the choice of headline environmental improvement projects (BAAP24)

8.25 The Council considers that there is evidence for the inclusion of all of the bullet points listed in part 5 of policy BAAP24, as follows. The fact that Bootle is a deprived area as set out in the national Indices of Deprivation is also relevant (see Appendix 2).

- **Improving existing greenspaces:** as set out in policy BAAP11 and earlier in this topic paper.
- **Improving small areas of under-used/ left over land for community environment projects:** many such sites, whether or not in Council ownership, are poor quality, poorly maintained and more likely to be subject to crime and anti-social behaviour including litter and fly-tipping. They detract from the attractiveness and perception of Bootle for residents and visitors. There are economic, environmental and social regeneration and green and blue infrastructure benefits from their improvement.
- **Enhancing nature:** as set out in policy BAAP9, earlier in this topic paper and in relation to national, regional and local priorities, including the LCR Local Nature Recovery Strategy

- **Improving priority routes between new development and existing public greenspaces:** as set out in policy BAAP11 and earlier in this topic paper.
- **Reducing litter/ fly-tipping:** Projects to deal with litter/ fly-tipping are included with the scope of BAAP24 Environmental Improvements because fly-tipping and litter are a concern for many residents; having a detrimental impact on the attractiveness and perception of Bootle for residents and visitors. For most local people, projects to reduce litter and fly-tipping are considered to offer clear environmental benefits (and health and other benefits). Figure 8.1 shows Council records of fly-tipping incidents in the Bootle Area Action Plan area between December 2022 and November 2024. Bootle Area Action Plan area covers 5.38% of the area of Sefton.

**Figure 8.1: Council records of fly-tipping incidents in the Bootle Area Action Plan area between December 2022 and November 2024**



There are approximately 44,000 residents in the plan area, compared to 275,899 for Sefton as a whole<sup>35</sup>; the plan area has around 16% of Sefton’s population. During the same period (December 2022 to November 2024) Council records show that the plan area had 2971 fly-tipping incidents (39.3%), compared to 7566 for the whole of Sefton (100%). There were

<sup>35</sup> Based on mid 2020 Population estimates, area selected as a best match of 2011 Census Output Areas to the Bootle AAP area).

3968 requests to clear rear entries (63.9%) in the plan area, compared to 1560 (100%) for the whole of Sefton, although it must be recognised that the plan area has relatively a lot more rear entries than the rest of Sefton. Combining these two sets of records gives figures of 3968 (43.5%) for the plan area, compared to 9126 for the whole of Sefton (100%). It is clear that the plan area suffers from relatively more fly-tipping and other 'unauthorised waste' issues compared to Sefton as a whole (including the plan area), and Figure 8.1 helps illustrate this.

- Improving the streetscape: as set out in policies BAAP3, BAAP4, BAAP5, BAAP8, BAAP20, BAAP21, BAAP22 and BAAP23, earlier in this topic paper and in relation to other local priorities including the regeneration of Bootle Town Centre.
- Tree planting (right tree, right place): as set out in many policies in the plan including BAAP1 Design, BAAP8, BAAP9 and BAAP11, earlier in this topic paper and in relation to national, regional and local priorities
- Supporting community and 'friends of' groups to manage and maintain local parks: this links to public greenspace improvements (see above) and to corporate priorities set out in the Council's Vision and Core Purpose
- Other projects that would improve the local environment: This both 'future proofs' the policy and would allow for projects relating to wider environmental and climate change indicators such as air quality and retrofit surface water management (such as rain gardens) or other measures. These are set out set out in many policies in the plan, earlier in this topic paper and in relation to national, regional and local priorities.

### Committed sums for environmental improvements (including for public greenspace)

8.26 Part 2 of policy BAAP24 sets out the committed sum in relation to part 1 of policy BAAP24 and part 4 of policy BAAP11, i.e. for major<sup>36</sup> housing and non-residential development and for any changes of use to a hot food takeaway. BAAP24 part 2 sets this as £2,680 at 2024/25 rates, per housing unit, 100 m<sup>2</sup> of non-residential floorspace and per hot-food takeaway. These thresholds are considered to be common, easy-to-measure thresholds in national and other local policy (in the Local Plan and Bootle Area Action Plan). Part 3 of policy BAAP24 says that this will be secured through a planning obligation, and can be offset by direct provision of environmental improvements off site (within the plan area).

8.27 The Homes Builders Federation made representations that this could make development unviable and undermine the plan's deliverability as Bootle has significant viability challenges. Sport England express other concerns. However, part 4 of policy BAAP24 takes account of viability, setting out that contributions will not be required where a robust assessment of a scheme's economic viability confirms that they cannot be achieved.

8.28 Paragraph 5.246 of the explanation to policy BAAP24 sets out the Council's approach to viability, referring to the viability assessment of the emerging plan. In summary, whilst many sites in Bootle have viability challenges, there is potential for improvement over the plan period and the

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<sup>36</sup> Major development as defined in Statutory Instrument **2015 No. 595**, the Town and Country Planning (Development Management Procedure) (England) Order 2015; including 10 or more dwellinghouses, buildings of 1,000 square metres or more; or development on a site of 1 hectare or more

Council should continue to seek a range of planning obligations (subject to viability). However, given this plan covers the period to 2040, and the Council aspire to regenerate Bootle, it should not be assumed that the viability position in Bootle would not improve to the point that all or most obligations can be secured.

8.29 The Council would expect the applicant to bear the cost of preparing both the viability assessment and its assessment by the Council's 'retained' viability consultants, in line with usual practice for example in relation to Local Plan policies for affordable housing and education contributions. The Council accepts that this should be made explicit in the explanation to policy BAAP24 (and indeed to BAAP17 or other policies where viability is relevant), and proposes the following change (based on paragraph 8.21 of the Local Plan):

**“5.247A Where an applicant seeks to depart from the policy position and provision of a commuted sum due to viability consideration, the Council will require a full financial assessment to be submitted by the applicants. This will be appraised by independent economic viability consultants. The applicant will be required to meet the full cost of this work”.**

8.30 The figure of £2,680 is based on extensive evidence collated over many years. This is the commuted sum used for off-site open space provision in relation to Local Plan policy EQ9 'Provision of public open space, strategic paths and trees' and the 2017 Open Space Supplementary Planning Document (SPD), which was carried forward from the previous (2008) Green Space, Trees and Development Supplementary Planning Document (see Appendix 6). The amount changes (usually, rises) annual in line with inflation (see Appendix 6). The sum has always been based on a contribution (rather than the full cost) of open space provision, including allowances for capital works, establishment (for 3 years), maintenance (for up to 10 years) and administration costs; plus any associated legal costs. More information is set out in Appendix 6.

8.31 As set out above, it is not considered to be an effective use of resources to work up and cost detailed schemes at the current time. However, the Council considers that this sum would represent a contribution towards the cost of any environmental improvements under policy BAAP24 (and see Appendix 5). As such, and given the viability clauses and evidence of need for all of the projects listed, the Council considers that this sum is in line with the tests set out in paragraph 57 of the December 2023 National Planning Policy Framework.

8.32 Part 3 of policy BAAP3 allows the commuted sum to be off-set by “*providing environmental improvements off-site*”. The Council also considers that there may be some site-specific circumstances where on-site improvements also may be acceptable as an off-set, where these are substantively over and above normal policy requirements and provide clear benefits to future residents and the wider neighbourhood. A key aspect is that these should provide substantive rather than minor benefits, and it is critical that such benefits are additional to any benefits provided under other policies, for example part 2 of policy BAAP9 Nature. Also, in such cases, the applicant must incorporate and demonstrate to the satisfaction of the Council that suitable arrangements for the long-term management and maintenance of, and public access to, the relevant facility or part of the site. This is in line with the approach set out in Local Plan policy EQ9 'Provision of public open space, strategic paths and trees'.

8.33 For example, this may include providing a new equipped play area on housing sites which are not within the Council's accessibility targets for community parks (sites BH1 Peoples' site, Linacre Lane, Bootle, BH3 Site of the former Bootle Gas Works, BH4 Site of Litherland House,

Litherland Road, and BH6 503-509 Hawthorne Road, Bootle). There may be other site-specific examples which emerge during the masterplanning or design of proposals.

8.34 Therefore the Council proposes the following change to part 3 of policy BAAP24:

*This will be secured through a planning obligation. The total financial contribution can be offset through providing environmental improvements off-site, **or on-site if these are substantively over and above normal policy requirements and the Council considers that they provide clear benefits to future residents and the wider neighbourhood.***

8.35 The Council also proposes a related change to the explanation to the policy to support this, by adding a new paragraph as follows:

**5.245A The Council will accept on-site environmental improvements on the site where the applicant can demonstrate to the Council's satisfaction that these are substantively over and above normal policy requirements and there are clear benefits to the future residents of the site and the wider neighbourhood. For example, this may include providing a new equipped play area on housing sites which are not within the Council's accessibility targets for community parks. In such cases, the applicant must incorporate and demonstrate suitable arrangements for long-term management and maintenance of, and public access to, the relevant facility or part of the site. The Council will need to be satisfied that these are in place before planning permission is granted.**

#### **Loss of public greenspace resulting from policy BAAP22 Open land between Irlam Road and the Asda store**

8.36 A Sefton resident objects to the loss of greenspace and climate impacts which would occur if policy BAAP22 Open land between Irlam Road and the Asda store were implemented as this site should be used for sport. While the site was designated as open space in the 2017 Local Plan, the Council considers this particular open space, especially the part now within BAAP22, to be 'left over land' (part of the open space site is an infilled railway cutting where built development is unlikely to be feasible. Over many decades the site has had very few;/ low value low green and blue infrastructure benefits, being poor quality, poorly maintained and subject to crime and anti-social behaviour, in part due to scarce Council resources<sup>37</sup>. The site has never been used for formal sport. The Council considers it to be an inappropriate size and location for formal sport, notwithstanding the lack of resources bringing it into sports use would entail. Therefore, considering the site-specific issues and history, the Council considers that the development of this site for employment-based uses is acceptable; the site has had instances of anti-social behaviour in the past and it is considered that development may resolve this.

#### **Policy BAAP23 Coffee House Bridge – greenspace and pitch issues**

8.37 The policy broadly carries forward housing allocation MN2.46 of the 2017 Sefton Local Plan, which allocated the former St Mary's school site for housing development. The school closed on 31st August 2025; almost two decades ago. However, the Area Action Plan policy extends the site boundary and clarifies that as well as housing, specified complimentary uses would be acceptable in principle. A Sefton resident objects to the loss of greenspace and climate impacts which would occur if policy BAAP23 Coffee House Bridge were implemented, saying that this site should be used for sport, with the relevant investment sought to make this happen. As set out in paragraph 8.16 above, at a practical level the Council's has had an effective shortage of funding over recent years with which to maintain existing public greenspaces including playing fields , let

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<sup>37</sup> Notwithstanding the community-led wildflower planting which took place for the first time in 2024.

alone additional sites (the site is not currently managed by the Council). As a rule of thumb Sefton Council is not in a position to adopt new public greenspace. An alternative is for developers to use management companies for on-going management and maintenance of public open space provided as part of new development. This relies on on-going contributions from occupiers/owners to these costs, for the lifetime of development. This is not without challenges.

8.38 Sport England object to the policy's unjustified removal of the Local Plan requirement for development of this site to *"ensure that the loss of the former playing pitch (es) is addressed consistent with Local Plan policy NH5. This will be achieved via a commuted sum payment (on a per dwelling basis) towards the provision of a new 3G pitch (es) at Litherland Sports Park"*. They consider that the additional population from housing development would generate extra demand for sports provision, and that while the 2023 Playing Pitch and Outdoor Sports Strategy (PPOSS) does not show a deficiency in mini pitches, this could change in the future. Litherland Sports Park is identified in the 2023 PPOSS as a "hub" site, drawing from a wider catchment, and reflects the Local Football Facility Plan's as a potential site for a second 3G pitch. The existing 3G pitch needs work to gain accreditation to enable match playing opportunities. Although Litherland Sports Park lies outside the plan area, Sport England would assume that some of the population living within the plan area would use it. Sport England consider that additional wording could be included to state that this would not be required if a viability assessment demonstrated the contribution was not viable.

8.39 Paragraph 5.235 of the plan summarises why the Council is not carrying forward this pitch requirement; this is a former primary school site and the 2023 Playing Pitch and Outdoor Sports Strategy (PPOSS) does not show a shortfall of (age-appropriate) mini pitches in Bootle and Netherton, or Sefton as a whole and Litherland Sports Park site is outside the plan area. Instead, paragraph 5.236 states that instead the site is subject to the more flexible approach of policy BAAP24. The Council considers that, in this case, wider environmental improvements would offset the loss of a potential (historic) pitch and playing field on the former school site. The school closed on 31<sup>st</sup> August 2005; almost two decades ago.

8.40 The Council has commented an 'Annual Review' of the 2023 PPOSS in consultation with the PPOSS Steering group including Sport England, the Football Foundation and Liverpool County Football Association. As yet there are no indications of future changes to need. The PPOSS (p110) recognises that between 2011 and 2021, in Sefton, the increase in children aged under 15 years was 0.3% (5% nationally) and the 15-19 and 20-24 age groups decreased by 16% and 15% respectively. The population aged 65+ increased by 13.5% while that of 15-64 year olds decreased by 1.3%. That is, the biggest increase in Sefton's population between 2011 and 2021 has been in age groups considered less likely to participate in pitch sports. There is nothing to suggest this trend will change in coming years.

8.41 While the PPOSS and 2024 Local Football Facility Plan<sup>38</sup> refer to the potential for a second 3G pitch at Litherland Sports Park, current indications from the emerging Annual Review are that this is currently not considered practicable. An alternative, already funded, 3G pitch site within the plan area may emerge at St John Bosco High School<sup>39</sup>, although the recent planning permission for

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<sup>38</sup> See <https://localplans.footballfoundation.org.uk/local-authorities-index/sefton/sefton-executive-summary/>

<sup>39</sup> See Agenda Item 10 at <https://modgov.sefton.gov.uk/documents/g11035/Public%20reports%20pack%2022nd-Jun-2023%2010.00%20Cabinet.pdf?T=10>

a new school alongside supporting sports facilities etc included only grass pitches<sup>40</sup>. The Council considers that while Litherland Sports Park is a hub site, it is outside the plan area.

8.42 Planning permission was refused in 2021 for a scheme at 'St Mary's Complex' which included housing, an arts hub and community buildings, and later dismissed on appeal<sup>41</sup>. The Council accepted that this compensatory pitch provision in line with the Local Plan requirement would help make the scheme unviable and so failure to provide this compensation was not a reason for refusal. The matter of compensatory provision was not referred to in the appeal decision. It is likely that viability would remain a challenge for this site in the near future.

8.43 Therefore, while the Council does not wish to take forward the Local Plan clause at this stage, if the Inspector is minded to agree with Sport England, the Council would accept Sport England's suggestion of additional wording to make this conditional on viability, if the Inspector is minded to include it in the AAP.

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<sup>40</sup> See decision DC/2024/0751, granted permission with conditions on 11<sup>th</sup> November 2024

<sup>41</sup> Decision notice DC/2020/00705, refused 18<sup>th</sup> February 2021, appeal APP/M4320/W/21/3281083 dismissed on appeal 13<sup>th</sup> September 2022



## 9. References

**National Planning Policy Framework (December 2023)** – see

<https://webarchive.nationalarchives.gov.uk/ukgwa/20231228093504/https://www.gov.uk/government/publications/national-planning-policy-framework--2>

[Note that this is a previous version of the National Planning Policy Framework (NPPF). The current [NPPF](#) was published on 12<sup>th</sup> December 2024]

**Proposed Changes to the National Planning Policy Framework (July 2024)** - see

[https://assets.publishing.service.gov.uk/media/669a25e9a3c2a28abb50d2b4/NPPF\\_December\\_2023.pdf](https://assets.publishing.service.gov.uk/media/669a25e9a3c2a28abb50d2b4/NPPF_December_2023.pdf)

**National Design Guide (2019)** – see <https://www.gov.uk/government/publications/national-design-guide>

**National Planning Practice Guidance** – see

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**National (English) Indices of Multiple Deprivation 2019** – see

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**Met Office Climate [Change] pages** – see for example

- Climate Dashboard <https://climate.metoffice.cloud/dashboard.html>
- Climate change in the UK <https://www.sefton.gov.uk/environment/energy-and-environment/climate-emergency/climate-emergency/what-is-climate-change/> , <https://climate.metoffice.cloud/dashboard.html> and <https://www.metoffice.gov.uk/weather/climate-change/climate-change-in-the-uk>

**HM Treasury Infrastructure Carbon Review (2023)** – see

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/260710/infrastructure\\_carbon\\_review\\_251113.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/260710/infrastructure_carbon_review_251113.pdf)

**Statutory Instrument 2015 No. 595, the Town and Country Planning (Development Management Procedure) (England) Order 2015** – see [The Town and Country Planning \(Development Management Procedure\) \(England\) Order 2015](#)

**Emerging LCR Spatial Development Strategy** – see <https://www.liverpoolcityregion-ca.gov.uk/sds>

**Emerging LCR Local Nature Recovery Strategy** - see <https://www.liverpoolcityregion-ca.gov.uk/local-nature-recovery-strategy>

**LCR Climate Emergency** – see <https://www.liverpoolcityregion-ca.gov.uk/combined-authority-sets-ambitious-targets-to-tackle-climate-emergency/>

**Sefton Local Plan (2017)** – see [www.sefton.gov.uk/localplan](http://www.sefton.gov.uk/localplan)

**Publication Draft Bootle Area Action Plan (2024)** – see Bootle AAP examination library – [www.sefton.gov.uk/BootleAAP](http://www.sefton.gov.uk/BootleAAP)

**Sustainability Appraisal (including Strategic Environmental Assessment) reports into Bootle Area Action Plan (SA reports):**

- **SA Scoping Report (July 2023)** – see Bootle AAP examination library – [www.sefton.gov.uk/BootleAAP](http://www.sefton.gov.uk/BootleAAP)
- **SA Stage B Report (December 2023)** – see Bootle AAP examination library – [www.sefton.gov.uk/BootleAAP](http://www.sefton.gov.uk/BootleAAP)
- **Environmental [SA] Report (July 2024)** – see Bootle AAP examination library – [www.sefton.gov.uk/BootleAAP](http://www.sefton.gov.uk/BootleAAP)

**Emerging Report of Public Consultation on Bootle Area Action Plan** – see Bootle AAP examination library – [www.sefton.gov.uk/BootleAAP](http://www.sefton.gov.uk/BootleAAP)

**Viability assessment for Bootle Area Action Plan** - see Bootle AAP examination library – [www.sefton.gov.uk/BootleAAP](http://www.sefton.gov.uk/BootleAAP)

**Strategic Flood Risk Assessment for Bootle Area Action Plan (2024)** - see Bootle AAP examination library – [www.sefton.gov.uk/BootleAAP](http://www.sefton.gov.uk/BootleAAP)

**Flood risk Sequential and Exception Test Assessment for Bootle Area Action Plan (2024)** – see Bootle AAP examination library – [www.sefton.gov.uk/BootleAAP](http://www.sefton.gov.uk/BootleAAP)

**Sefton SuDS and Flood Risk Pro Forma** – see [https://www.sefton.gov.uk/media/7382/final\\_sefton\\_suds\\_-\\_pro-forma\\_1\\_web.pdf](https://www.sefton.gov.uk/media/7382/final_sefton_suds_-_pro-forma_1_web.pdf)

**Information Note: Managing and mitigating the impact of recreation pressure on the Sefton Coast - Sefton's Interim Approach for housing development (2023)**– see [https://www.sefton.gov.uk/media/4485/hrarecpressureinfo\\_note\\_24-25\\_rates\\_final.pdf](https://www.sefton.gov.uk/media/4485/hrarecpressureinfo_note_24-25_rates_final.pdf)

**Sefton Open Space and Recreation Study (2015)** – see <https://www.sefton.gov.uk/media/2462/openspace-recreation-study-sefton-nov2015.pdf>

**Sefton Playing Pitch and Open Space Strategy (2023)** – see [sefton.pposs.strategyactionplan.adopted.7-23.pdf](http://sefton.pposs.strategyactionplan.adopted.7-23.pdf)

**Sefton Climate Change and Climate Emergency webpages** – see <https://www.sefton.gov.uk/environment/energy-and-environment/climate-emergency/climate-emergency/> ,

**Sefton's air quality Annual Status Report (July 2024)** – see <https://www.sefton.gov.uk/media/mdbufiyxx/air-quality-status-report-2024.pdf>

**Football Foundation's Sefton Local Football Facility Plan (2024)** - see <https://localplans.footballfoundation.org.uk/local-authorities-index/sefton/sefton-executive-summary/>