

# RTPI response to Liverpool City Region: Our Places (Stage 2) - Vision & Objectives

*February 2021*

This is the RTPI's response to the Liverpool City Region Combined Authority's (LCRCA) consultation on the [vision & objectives](#) of their Spatial Development Strategy (SDS) ahead of consultation on the full document at a later date.

In preparation, the LCRCA has been seeking [further views](#) on their proposed vision and set of objectives, along with approaches to several key policy areas. The objectives cover climate change and environment, health and wellbeing, inclusive economy, placemaking and communities and social value.

We note that the LCRCA are not addressing housing numbers at this stage with this to be consulted on at the next stage. We consider that a valuable potential role of a city region plan is to provide a housing distribution across the city region and to ensure that it is aligned with infrastructure investment. The combined authority is arguably a better arbiter of the distribution across the housing numbers than central government.

## Context

The RTPI welcomes the work of the LCRCA in consulting on a vision and set of objectives as they prepare their SDS. It is encouraging to see the ambitious vision set out by the LCRCA that in 15 years the City Region will be one where *“a proactive, collaborative Spatial Development Strategy has been instrumental in delivering the goal of inclusive growth alongside environmental responsibility.”*

Progress achieved by the city region in the last 10 years has been impressive; an internationally popular culture and visitor economy has developed, the universities are acting as major investors and civic leaders; the port has expanded and nationally recognised strengths in material science have been progressed in infectious diseases control and high performance computing<sup>1</sup>. However, the challenges<sup>2</sup> faced by the city region in seeking to level up with the UK are significant<sup>3</sup>. These include the legacy of the City Region's industrial past, shifts in the global economy and Covid-19.

More broadly, the RTPI's 2019 research study *Ambitions for the North*<sup>4</sup>, alongside other components of the Great North Plan initiative (including the economic strategy work from IPPR

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<sup>1</sup> Liverpool City Region Combined Authority (2020) [Building Back Better](#)

<sup>2</sup> Liverpool City Region Combined Authority (2020) [Draft Local Industrial Strategy](#)

<sup>3</sup> Liverpool City Region Combined Authority (2020) [Liverpool City Region Economic Recovery Plan](#)

<sup>4</sup> RTPI (2019) [Ambitions for the North - A Spatial Framework For People and Places](#)

North<sup>5</sup>), are designed to contribute to an emerging, pan-northern spatial framework for people and places. It recommends a more ambitious approach to strategic planning and governance across the North of England.

## General comments

1. **Evidence base:** The Spatial Development Strategy (SDS) will be most effective where it is supported by detailed analysis of the patchwork of issues affecting the city region. This will ensure that policy interventions are made using a robust evidence base. The range of issues faced by the City Region includes low-quality housing, entrenched deprivation, poor air quality, relatively low business density, low skills levels, high economic inactivity, poor health outcomes, and levels of poverty and deprivation. We encourage the LCRCA to maintain their programme of stakeholder engagement as the Combined Authority prepares their evidence base.
2. **Alignment and timing:** How the SDS interacts with local and national policy developments and resolves cross boundary issues within the LCRCA are important considerations. For example, avoiding duplication between the documents is important. The underlying approach should be to achieve 'buy in' from across the city region. The relationship with national policy is another necessary consideration, it will be important that the SDS aligns with any upcoming national developments on the Planning White Paper, Transport Decarbonisation Plan, Future Homes Standard<sup>6</sup> and accessibility standards for new homes.
3. **Viability and achievability:** The SDS should strike an appropriate balance between requiring high standards in development on the one hand, and the potential effect on the viability of developments on the other. It should not prevent development from coming forward in sustainable locations and areas in need of regeneration. The RTPI recommends identifying and coordinating the upfront infrastructure funding needed to maintain viability in weak housing markets. Public-sector master planning, with close involvement from infrastructure providers, can provide confidence for developers and local communities, and ensure that measures taken to stimulate construction are coupled with the investments needed to deliver sustainability and resilience.
4. **Environmental performance:** The RTPI published recommendations in 2020 on strategic planning for climate resilience<sup>7</sup>. The analysis and evidence-base put together as part of that report aims to help combined authorities and other strategic planning bodies think more holistically about climate resilience and prompt them to consider climate vulnerability and risk, beyond flooding, in their plans. The retrofitting of existing homes will be one of the biggest challenges for achieving net zero emissions and recent steps by LCRCA in this regard appear to be a positive start<sup>8</sup>.

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<sup>5</sup> The Institute for Public Policy Research (2019) [Power and prosperity: A strategy for the North to take control of its economy](#)

<sup>6</sup> MHCLG (2021) [Government response to the Future Homes Standard: changes to Part L and Part F of the Building Regulations for new dwellings](#)

<sup>7</sup> RTPI (2020) [Strategic planning for climate resilience](#)

<sup>8</sup> Liverpool City Region Combined Authority (2020) [Liverpool City Region to Pioneer Modern Methods of Construction to boost Economic Recovery](#)

# Response to proposed objectives

## Climate change and environment

[Read LCRCAs proposed policies here](#)

We welcome the City Region's target of achieving net zero carbon by 2040. The RTPI published recommendations<sup>9</sup> to assist planners in helping local authorities to adapt to and mitigate against climate change. This action research was undertaken by RTPI staff working with the LCRCAs and constituent councils during 2019 and incorporates studies of good practice made for the RTPI by the planning schools at the Universities of Liverpool and Manchester. This report outlined the following key messages:

- The evidence base and analysis underpinning the SDS can play a crucial role in helping LPAs in the area to think about climate resilience holistically, and consider climate vulnerability and/or risk, beyond flooding, in their local plans.
- The SDS can help the LPAs to address local and city-regional challenges through adoptable standards. The scope of the combined authority to develop a region-wide SDS alongside a robust evidence base will be the most effective way of building climate resilience across the Liverpool City Region.

An LCR wide evidence base must:

- Consider different scenarios and probabilities. Temperature rises will cause risks to change and develop and the way in which we address risk should adapt to these changes.
- Support climate-justice based approaches that tackle the challenges associated with climate change while ensuring an equitable approach that tackles climate change for everyone.
- Support targeted policy interventions through evidence of strategies that specifically reduce risk factors and set out management priorities, either through soft or hard infrastructure.
- Generate evidence bases for both small-scale local issues and also issues that might impact the region as a whole, such as management of the Mersey basin. Such evidence could also help support cross border collaboration between LPAs on common regional issues.

The RTPI has also published research on the important role of spatial planning and place-based solutions to the decarbonisation of surface transport<sup>10</sup>. This recommends that local and combined authorities adopt a fully integrated approach to transport and land use planning, following the steps outlined below:

1. Ensuring that all new development is located and designed to generate no new transport emissions, and ideally to be 'carbon negative'

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<sup>9</sup> RTPI (2020) [Strategic planning for climate resilience](#)

<sup>10</sup> RTPI (2021) [Net Zero Transport: the role of spatial planning and place-based solutions](#).

2. Reducing travel demand through home-working, digital services and local living, as a core principle of new development and urban renewal
3. Shifting modes from private vehicles to walking, cycling and public transport, aiming for levels which exceed current UK best practice scenarios
4. Switch remaining trips by private vehicles, public transport and freight to run on alternative fuels, such as electric vehicles

We encourage the LCRCA to embed this approach into the vision and objectives, in order to develop a clear emissions reduction pathway for surface transport that is consistent with the LCR net zero target.

### Coast and estuary

The work on the Mersey Tidal Power Project<sup>11</sup> should continue and form part of the SDS. The coast and the estuary are unique selling points for the city region and require coherent management and funding.

### Health and wellbeing

[Read LCRCA's proposed policies here](#)

It is encouraging to read the LCRCA's broad objective of "*improving the conditions in which people and our future generations are born, live, work and age*" and the ambition to improve air quality. However, the SDS will need to clarify how exactly it will deliver on this objective.

The challenges are stark: on air quality, the British Lung Federation found that up to 1,040 deaths per year can be directly linked to exposure to air pollution<sup>12</sup> in the Liverpool City Region. We understand that the LCRCA are preparing the evidence base on this issue<sup>13</sup>. Establishing the evidence is complicated by fluctuations in air quality during Covid-19. On transport, we note the establishment of the Liverpool City Region's Station Commission<sup>14</sup> and the ongoing discussion regarding the management of the bus system in the city region.

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<sup>11</sup> Liverpool City Region Combined Authority [Mersey Tidal Power Project](#)

<sup>12</sup> British Lung Federation (January 2020) [The health and economic impacts of toxic air in Liverpool City Region](#)

<sup>13</sup> Liverpool City Region Combined Authority (2020) [Liverpool City Region Combined Authority Building Back Better – Improving our Air Quality](#)

<sup>14</sup> Merseytravel (2020) [Station Commission begins journey towards a world class rail station for the Liverpool City Region](#)

## Inclusive economy

[Read LCRCA's proposed policies on this objective here](#)

We support the objective of “transforming the City Region economy so that it is competitive, environmentally clean, well connected, socially inclusive and future ready”.

However, the challenges<sup>15</sup> faced by the city region in seeking to level up with the UK are significant<sup>16</sup>. These include the legacy of the city region’s industrial past, shifts in the global economy and Covid-19. This is demonstrated through low-quality housing, entrenched deprivation, poor air quality, relatively low business density, low skills levels, high economic inactivity, poor health outcomes, and levels of poverty and deprivation.

**High streets & town centres:** We welcome LCRCA’s objective to “revitalise town centres so that they are renewed focal points for communities and businesses”. The RTPI recommends approaches that seek to regenerate, revitalise and diversify town centres and high streets. The Institute encourages a town centre first approach by taking a holistic, plan-led approach to the integration of high-quality affordable homes.

We encourage approaches that plan for mixed-use communities with accessible local services, digital connectivity and networks of green and active transport infrastructure. This investment will capture the benefits of more flexible and remote working patterns, reduce pressure on both local and strategic transport networks, freeing up capacity, which avoids the need for costly upgrades.

**Impact of Permitted Development Rights:** The RTPI has warned of the potential harmful effects on high streets of the increased use of PD rights<sup>17</sup>. Recent government proposals to expand PD rights could also negatively impact the high street and town centres by allowing a wide range of business premises to be converted to residential premises<sup>18</sup>.

The RTPI recommend that LCRCA work with the government and local authorities in the city region to establish the most effective ways to ensure any expansion of PD rights does not undermine plans to revitalise high streets and town centres.

## Placemaking and communities

[Read LCRCA's proposed policies here](#)

We fully endorse the LCRCA objective of “ensuring high design standards to deliver beautiful buildings and places that are future ready, safe, sustainable, energy efficient and enable healthier and happier lives”. Quality design should be a key factor in formulating and implementing planning policies, given that it can help to improve health, create more environmentally sustainable places, attract investment and support civic pride.

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<sup>15</sup> Liverpool City Region Combined Authority (2020) [Draft Local Industrial Strategy](#)

<sup>16</sup> Liverpool City Region Combined Authority (2020) [Liverpool City Region Economic Recovery Plan](#)

<sup>17</sup> RTPI (2020) [Uncontrolled PDRs could damage post-Covid high street recovery, warns RTPI](#)

<sup>18</sup> RTPI (2021) [RTPI response to MHCLG Supporting housing delivery and public service infrastructure consultation](#)



Ensuring high design standards should be part of a comprehensive approach that shapes not only the large-scale projects, but the combined issues from the multiple smaller projects too. We recommend that the LCRCA engage with and adapt as appropriate the work being undertaken by the West Midlands Combined Authority through their design charter<sup>19</sup>.

The LCRCA has an abundance of heritage including a large World Heritage site, the world's first inter-city railway, the world's first public park, a pioneer garden suburb and the world's first commercial enclosed wet dock. We recommend that the SDS has clear policies to identify, enhance and protect such areas of national and international significance.

The RTPI's Plan the World We Need research<sup>20</sup> explored the implications of changing levels of homeworking, which are likely to decrease as Covid-related restrictions are lifted. The value of physical interaction to productivity, collaboration and innovation will remain important, along with the benefits of in-person conversations, socialising and mentoring. Some will lack comfortable space for homeworking or have struggled to separate professional and domestic life. Property managers are anticipating the return of employees to offices and making the necessary changes to enable social distancing.

However, the experiences of lockdown are likely to lead to a permanent increase in flexible working arrangements in sectors and occupations where remote working has been shown to be not only possible but in many instances, beneficial. Many employers have rapidly overcome practical challenges to homeworking and changed their perception around the productivity of homeworking. In a survey of 6,000 office workers across the UK, Germany, France and the Netherlands, only 24% of UK respondents said they wanted to return to the office full-time. Major tech companies, such as Twitter, Google and Facebook, are among those offering greater long-term flexibility to their employees.

## Social value

[Read LCRCA's proposed policies here](#)

We support the LCRCA's objective of "*ensuring that social value generated by development benefits the users, occupiers and surrounding communities, particularly those that are most deprived and excluded*". It is encouraging to see a focus on supporting strong, vibrant and healthy communities.

The RTPI considers that inclusivity should be at the heart of all decision making. Our Plan the World we Need campaign<sup>21</sup>, launched in 2020, seeks to establish an inclusive approach to recovery to the Covid-19 pandemic. The pandemic has already exacerbated existing patterns of inequality and disadvantage both within and between places, and these could further worsen during the economic downturn.

The RTPI published research considering how local authorities can measure the outcomes of planning<sup>22</sup>. This means going beyond simple metrics like speed of processing applications and number of housing units delivered and assessing planning in terms of placemaking aspirations

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<sup>19</sup> West Midlands Combined Authority (2020) [Charter launched to champion good design in the West Midlands](#)

<sup>20</sup> RTPI (2020) [Plan The World We Need research paper](#)

<sup>21</sup> RTPI (2020) [Plan the World We Need](#)

<sup>22</sup> RTPI (2020) [Measuring What Matters: Planning Outcomes Research](#)

and social, economic and environmental value, in order to track and improve the impact of planning. The project culminated in the development of a report and series of toolkits, which can be adapted by LPAs across the UK and Ireland to improve their outcome measurement.

Across the UK, years of austerity have already led to cuts to local government spending and the dismantling of neighbourhood services, which disproportionately affect women, ethnic minorities and the disabled to identify just a few. Loss of income and stability of employment could push more people into insecure housing, and the most vulnerable into homelessness. We encourage the LCRCA to address broad social and community needs and aspirations; in that regard we note the establishment of the LCRCA Land Commission<sup>23</sup>.

Disadvantaged communities are also disproportionately affected by the environmental risks caused by climate change, such as flooding and overheating<sup>24</sup>. These risks will continue to increase during the recovery period, interacting with and exacerbating the vulnerabilities. The institute, alongside the United Nations, the Climate Change Committee, the Environmental Justice Commission and the Wellbeing Economy Alliance, has called for a strong focus on social justice during the recovery. This will involve prioritising long-term human wellbeing and equality through capacity building within communities and policies, which reduce vulnerabilities to climate and other risks, considering socio-economic status.

We recommend:

- **Improving the quality of existing homes and neighbourhoods.** The current focus of planning on new build supply must be complemented with a massive uplift in improvements to existing housing and settlements, which comprises the great majority of the stock and communities. Much-needed investment in energy efficiency retrofit should be linked to masterplans which regenerate deprived areas, protecting the rights of existing residents, and improving access to jobs, services, amenities and infrastructure.
- **Economic growth.** It is important that the approach to housing supports the LCRCA's economic objectives through the provision of homes for all tenures including for the aspirational and families to support the LCR becoming a leader in advanced industry. This could help to deliver an increase in employment and improvements to the city region's education and skills base.
- **Deliver high quality and affordable housing in the right locations.** Significant growth should be mixed use and targeted on brownfield sites which support wider regeneration efforts. Housing should come from a more diverse range of providers, including SMEs, housing associations, local authorities and the custom and self-build sector, with clear design standards for space (both internal and external), light and thermal efficiency as well as heating and cooling.
- **Improving access to green spaces.** Parks, public gardens and other open spaces should be integrated into strategic plans for critical green and blue infrastructure. These should improve quality, scale and accessibility of quality green spaces, especially in areas of deprivation, while delivering multifunctional benefits such as flood mitigation, cooling, air quality, active travel, biodiversity gains, habitat creation and space for urban

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<sup>23</sup> RTPI, The Planner magazine (2020) [England's 'first' land commission launched in Liverpool](#)

<sup>24</sup> RTPI (2020) [Five Reasons for Climate Justice in Spatial Planning](#)



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agriculture.

- **Embedding ‘climate justice’ in plan-making.** Strong climate mitigation and adaptation policies are required to achieve net zero carbon and increase resilience to environmental risks. These policies must be designed to support the most vulnerable in society, integrated with the measures outlined above.