



*Knowsley Council*

# **Knowsley Local Plan: Core Strategy**

Duty to Cooperate Statement  
(Draft)

Core Strategy Proposed Submission Document  
**November 2012**

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## 1. Introduction

- 1.1 The **Knowsley Local Plan: Core Strategy** (referred to in this document as the “**Core Strategy**”) is one of three “development plan documents” being prepared by Knowsley Council to form the Knowsley Local Plan, the others being:
- A future Local Plan: Site Allocations and Development Policies document; and
  - The Joint Merseyside and Halton Waste Local Plan.
- 1.2 The Localism Act (2011) introduced a duty for the Council to “co-operate” with other local planning authorities and prescribed public bodies when preparing development plan documents. The National Planning Policy Framework<sup>1</sup> (NPPF) provides advice on how the duty should be implemented.
- 1.3 This Statement sets out how Knowsley Council has satisfied the “duty to co-operate” in preparing the Core Strategy. The Statement is being made available in draft at the same time as the "Proposed Submission" version of the Core Strategy. This will give interested parties the opportunity to comment on the Council’s approach to meeting this duty alongside any comments they may have on the Strategy.
- 1.4 A final version of this Statement will be submitted to the Secretary of State with the Core Strategy in early 2013.
- 1.5 The “duty to co-operate” is separate from other more general statutory requirements concerning consultation and publicity when preparing Local Plans, which are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. A separate statement<sup>2</sup> sets out how the Council has involved other bodies and persons at previous stages of preparation of the Plan and how their comments have been addressed.

## 2. The “duty to co-operate”

- 2.1 The key legislation governing the "duty to co-operate" is the Planning and Compulsory Purchase Act 2004 as amended by the Localism Act 2011.
- 2.2 Section 33A of the Act requires local planning authorities to “.....*engage constructively, actively and in an on-going basis.....*” with other local planning authorities, County Councils and other prescribed public bodies when preparing development plan documents. The duty also includes supporting activities, such as the preparation of the evidence base.
- 2.3 The duty should be applied to any “strategic matter” related to the preparation of the document which has a significant impact on at least two planning areas. Strategic matters can be far reaching in geographical extent depending on the

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<sup>1</sup> The National Planning Policy Framework (CLG, 2012)

<sup>2</sup> Knowsley Local Plan: Core Strategy – Statement of Previous Consultation, November 2012

nature of the issue. The aim of such co-operation is to maximise the effectiveness of the documents.

### The National Planning Policy Framework (NPPF)

- 2.4 Paragraph 181 of the NPPF states that *“Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination”*. Paragraph 181 also provides examples of how evidence of co-operation may be demonstrated, such as jointly prepared strategies or planning policies, joint committees with neighbouring authorities to make decisions or memorandums of understanding to agree how authorities and bodies will co-operate with each other as they prepare planning policy or strategy.
- 2.5 Section 33A (6) of the Act adds legal weight to this guidance, requiring the Council to consider whether to prepare agreements on joint approaches to strategic planning, including whether to prepare joint local development documents with neighbouring local planning authorities.
- 2.6 Paragraph 178 of the NPPF also states that *“public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities ...”*. The NPPF defines these strategic priorities as:
- the homes and jobs needed in the area;
  - the provision of retail, leisure and other commercial development;
  - the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
  - the provision of health, security, community and cultural infrastructure and other local facilities; and
  - climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.
- 2.7 Section 4 of this statement identifies the strategic matters identified in Knowsley and appendix 1 describes how the Council has co-operated on each of these issues in preparing its Core Strategy.
- 2.8 When the Act and NPPF were finalised the Knowsley Core Strategy had already passed its "Preferred Options" stage. The Core Strategies of neighbouring authorities were in some cases even more advanced. Indeed, two neighbouring authorities (St Helens and Halton) had already submitted their Core Strategies to the Secretary of State at the time of the publication of the NPPF, while another (Liverpool City Council) published its Core Strategy at around the same time as the NPPF was published in March 2012.
- 2.9 Due to the relatively advanced nature and varying timescales of Core Strategies being produced in the City Region, it has not been practicable for Knowsley Council to respond to the new duty to co-operate by considering whether to prepare its Core Strategy as a joint plan with neighbouring authorities.

- 2.10 Nevertheless, the Core Strategy has been based on a very strong degree of joint working with neighbouring authorities. As set out in section 4 and appendix 1 of this Statement collaborative working has covered all the strategic matters identified in the NPPF.
- 2.11 The Council is also preparing the Joint Merseyside and Halton Waste Local Plan with the five other authorities in the Liverpool City Region. Further details on the Waste Local Plan are in paragraph 3.10 below.
- 2.12 In the circumstances the Council considers the approach it has taken to strategic planning in Knowsley to be compliant with the legal duties introduced by the Localism Act and with the advice in the NPPF.

### **3. The Knowsley Context**

#### The Liverpool City Region

- 3.1 The Borough of Knowsley includes a belt of suburban towns and villages which lie between the city of Liverpool to the west, St Helens to the east, and Widnes to the south east. The Borough has very strong linkages with nearby areas (particularly Liverpool) in terms of housing markets, travel to work areas and town centre catchment areas. The links with neighbouring areas are described further in chapter 2 of the Core Strategy and its supporting Technical Reports.
- 3.2 The Liverpool City Region comprises the 6 local authorities of Halton, Knowsley, Liverpool, St Helens, Sefton and Wirral. Each of these is a unitary (i.e. single tier) local authority, between which there are strong and developing governance arrangements.
- 3.3 The Liverpool City Region Cabinet comprises the Leaders of the six local authorities and is supported by thematic Boards, one of which (the Housing and Spatial Planning Board) covers planning matters. The Liverpool City Region Local Enterprise Partnership (LEP) was formally constituted in March 2012 and includes representatives from the private, voluntary and local authority sectors.
- 3.4 All the districts within the City Region apart from Halton comprise the former Merseyside county area.
- 3.5 The Merseyside Integrated Transport Authority (otherwise known as Merseytravel) covers the five Merseyside districts (Knowsley, Liverpool, St Helens, Sefton and Wirral) and leads on the provision of a sustainable transport system and the preparation of the Merseyside Local Transport Plan.
- 3.6 The five Merseyside districts are also members of the Merseyside Recycling and Waste Authority (which leads on the management and disposal of Local Authority Collected Waste), the Merseyside Fire and Civil Defence Authority and the Merseyside Police Authority.

- 3.7 There are also several officer level bodies including the Liverpool City Region District Planning Officers and its sub groups. The Merseyside Environmental Advisory Service provides specialist support and advice to the City Region authorities on environmental planning, waste, minerals, contaminated land and ecology.

Joint working on planning strategies across the City Region

- 3.8 The Liverpool City Region authorities have a strong history of co-operative working on strategic planning matters.
- 3.9 When the Regional Spatial Strategy for the North West (RSS) was being produced in 2006 and 2007, the Liverpool City Region authorities collaborated with the former regional planning body (4NW) and with each other in the drafting of the document and its evidence base. This collaboration also included the presentation of agreed approaches to the various issues during the examination in public stage of the RSS e.g. covering housing numbers, settlement hierarchy and Green Belts.
- 3.10 The Joint Merseyside and Halton Waste Local Plan is a joint development plan document being prepared by Merseyside Environmental Advisory Service (MEAS) on behalf of Halton, Knowsley, Liverpool, St Helens, Sefton and Wirral Councils. The Plan provides a strategy and range of site allocations which will promote sustainable management of waste across the City Region. The Waste Local Plan was submitted to the Secretary of State in February 2012 and is currently undergoing its examination in public. A separate statement relating to the "Duty to Cooperate" for the Waste Local Plan has been prepared and published as part of the Waste Local Plan examination library<sup>3</sup>. It is expected that the Waste Local Plan will be adopted by each of the authorities involved during early 2013.
- 3.11 The Liverpool City Region authorities have also collaborated for several years in a wide range of joint evidence base studies specifically to underpin their emerging Core Strategies. Details of studies which are relevant to individual strategic matters are set out in section 4 and appendix 1 of this Statement.
- 3.12 The Liverpool City Region authorities have collaborated on a wide range of other activities which have a bearing on the approach to specific planning issues. Examples of this include the Liverpool City Region Housing Strategy (2007), the Merseyside Local Transport Plan (2011), the Liverpool City Region Local Investment Plan, and the Liverpool City Region Economic Review. Where relevant to the issues tackled in the Knowsley Core Strategy these are described in appendix 1.

Defining the list of bodies to which the "duty to co-operate" applies

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<sup>3</sup> Document "PS039 – Compliance with Duty to Cooperate" (MEAS, 2012) available from [http://merseysideas-consult.limehouse.co.uk/portal/public\\_docs/wdpd\\_docarchive?tab=files](http://merseysideas-consult.limehouse.co.uk/portal/public_docs/wdpd_docarchive?tab=files)

3.13 Section 33A of the Act and Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 define specific bodies and categories of bodies with which the Council must co-operate in preparing its Core Strategy. The bodies which the Council considers to be relevant in the context of the Knowsley Core Strategy are set out below:

- Halton Borough Council (as planning and highway authority)
- Liverpool City Council (as planning and highway authority)
- St Helens Council (as planning and highway authority)
- Sefton Council (as planning and highway authority)
- Cheshire West and Chester Council (as planning authority)
- Warrington Borough Council (as planning authority)
- West Lancashire Borough Council (as planning authority)
- Wirral Council (as planning authority)
- Lancashire County Council (as county planning and transport authority)
- The Environment Agency
- English Heritage
- Natural England
- Civil Aviation Authority
- Homes and Communities Agency
- NHS Knowsley (as the Primary Care Trust)
- Office of Rail Regulation
- Merseytravel (as integrated transport authority)
- Marine Management Organisation
- Liverpool City Region Local Enterprise Partnership
- Liverpool City Region Local Nature Partnership (NB still in development at the time of writing this statement)

3.12 In defining the list the Council has had regard to the definition of “strategic matter” set out in the legislation<sup>4</sup>, which includes “...*sustainable development or use of land that has or would have a significant impact on at least two planning areas ...*” (underlining inserted by the Council). The Core Strategy may have impacts on other planning areas (not represented by the bodies listed above) but the Council considers it unlikely that these impacts will be significant.

3.13 The Knowsley Core Strategy has a varying level of impact on and linkage with the activities and responsibilities of these bodies. For example, whereas the Strategy is likely to have a strong linkage with neighbouring planning authorities within the Liverpool City Region, the degree of linkage with some of the other bodies is lower. The Council has therefore tailored the approach to co-operation with each body according to the nature of the issues which relate to that body.

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<sup>4</sup> “Strategic matters” are defined in what is now (by virtue of Section 110 of the Localism Act) Section 33A (4) of the Planning and Compulsory Purchase Act 2004

3.14 In addition the Council has co-operated with several other bodies (outside the list of prescribed bodies in the legislation) in preparing the Strategy. These include:

- The Highways Agency
- Network Rail
- Utility providers (United Utilities, National Grid, power companies and telecommunications network providers)
- The Coal Authority
- The Knowsley Chamber of Commerce
- Sport England
- The Knowsley Local Strategic Partnership (LSP)
- The emergency services

#### **4 Co-operation on the "strategic matters"**

##### General approach

- 4.1 The Council has consulted the "duty to co-operate bodies" ("DtC bodies") where these were in existence at the time at each formal stage of preparation of the Strategy i.e. Issues and Options, Preferred Options and Proposed Submission stage. The Council has carefully logged the comments made up to Preferred Options stage and will continue this approach in future stages of the Core Strategy. The specific ways in which the Council has considered and where appropriate responded to points made by each body are set out in the Council's Reports of Consultation<sup>5</sup> and "Accounting for Report of Consultation"<sup>6</sup> documents.
- 4.2 At pre-preparation stage, the Council undertook a series of workshops in each of the Borough's four township areas (Halewood, Huyton, Kirkby, and Prescot/Whiston/Knowsley Village/Cronton). These workshops (known as the "Plan Knowsley" workshops<sup>7</sup>) identified the key attributes and issues affecting each area, and involved several of the "DtC" bodies.
- 4.3 The Council has also undertaken a series of workshops involving neighbouring local authorities and some of the other DtC bodies at each subsequent stage of Strategy preparation (i.e. Issues and Options, Preferred Options and Proposed Submission stage).
- 4.4 The Council has also undertaken more specific forms of co-operation to address specific issues with different bodies or groups of bodies. These are set out below and in appendix 1.

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<sup>5</sup> Knowsley Core Strategy Issues and Options Paper: Report of Consultation (Knowsley MBC, 2010) and Knowsley Core Strategy Preferred Options Report: Report of Consultation (Knowsley MBC, 2011)

<sup>6</sup> Accounting for Preferred Options Consultation (Knowsley MBC, 2012)

<sup>7</sup> "Plan Knowsley" Stakeholder Engagement Workshops – An Overview of the Findings - Final Report (Vision Twenty One/Knowsley MBC, 2008)

Co-operation on the "strategic matters"

4.5 Taking account of paragraph 156 of the NPPF, the Council has identified the strategic matters set out below as requiring co-operation with other bodies under the "duty to co-operate". The list excludes waste issues as these are covered by the preparation of the Joint Merseyside and Halton Waste Local Plan (see paragraph 3.10 of this Statement).

NPPF Strategic Priority	Knowsley Strategic Issue
Homes and Jobs	<ul style="list-style-type: none"> <li>➤ <i>The level of housing growth in Knowsley relative to neighbouring areas</i></li> <li>➤ <i>The mix of housing types and levels of affordable housing provision in Knowsley relative to neighbouring areas</i></li> <li>➤ <i>The level of gypsy and traveller accommodation in Knowsley relative to neighbouring areas</i></li> <li>➤ <i>The amount of land needed for employment in Knowsley relative to neighbouring areas</i></li> <li>➤ <i>The approach to reviewing Green Belt boundaries in Knowsley to meet development needs</i></li> <li>➤ <i>Any cross boundary impacts arising from specific broad locations for Green Belt release</i></li> </ul>
Retail, leisure and commercial development	<ul style="list-style-type: none"> <li>➤ <i>The strategic role of Knowsley's town centres (Huyton, Kirkby and Prescot) relative to centres in neighbouring districts</i></li> </ul>
Infrastructure	<ul style="list-style-type: none"> <li>➤ <i>The impacts of the Core Strategy on transport infrastructure in the Liverpool City Region</i></li> <li>➤ <i>The impacts of the Core Strategy on other forms of infrastructure (e.g. utilities) in the Liverpool City Region</i></li> <li>➤ <i>The potential future expansion of Liverpool John Lennon Airport</i></li> </ul>
Health, community and cultural infrastructure	<ul style="list-style-type: none"> <li>➤ <i>The impacts of the Strategy on strategic health provision (e.g. Whiston Hospital), and community and cultural infrastructure in the City Region</i></li> </ul>
Climate change and natural and historic environment	<ul style="list-style-type: none"> <li>➤ <i>The impact of the Strategy on the low carbon infrastructure potential of the Liverpool City Region</i></li> <li>➤ <i>The impact of the Strategy on Green Infrastructure in the Liverpool City Region</i></li> <li>➤ <i>The impact of the Strategy on protected natural habitats including those in neighbouring districts protected by European legislation</i></li> <li>➤ <i>The impact of the Strategy on water management issues including flooding</i></li> </ul>

4.6 Appendix 1 sets out the nature of each of the strategic matters set out above, the bodies with which the Council has co-operated, how this co-operation has been undertaken and what the outcome of the co-operation has been in terms of the agreed approach to each strategic matter in the Core Strategy.

4.7 The section below sets out further details of how the Council has co-operated with specific categories of "DtC" body in preparing the Strategy.

#### Local planning authorities

4.8 In addition to being involved in the strategic matters and joint evidence base production as set out in appendix 1, each local planning authority in the Liverpool City Region and neighbouring areas to Knowsley have been consulted at all stages of preparation of the Strategy. Where neighbouring districts have raised concerns at earlier stages of the Plan preparation these have also been addressed through specific meetings with those authorities.

#### Transport and highway authorities

4.9 Merseytravel (see paragraph 3.5 above) has been closely involved at all stages in the preparation of the Core Strategy. This has included the use of joint modelling of future transport requirements to underpin the emerging Core Strategies of the districts and the Merseyside Local Transport Plan<sup>8</sup>. Merseytravel has also been involved as a stakeholder to inform the transport evidence base which underpins the Core Strategy and in the preparation of the Infrastructure Delivery Plan<sup>9</sup> for Knowsley. Neighbouring highway authorities have also been consulted at each stage of preparation of the Core Strategy.

#### Environment Agency, English Heritage and Natural England

4.10 These three bodies have been consulted at all stages of preparation of the Core Strategy and revisions made to emerging policy approaches as appropriate. They have also been heavily involved in the scoping and agreement of outcomes from the Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA) processes. These have resulted in amendments to the policies as the Strategy has developed.

4.11 The Environment Agency has also been involved in the commissioning and agreement of evidence on flooding, drainage and waste water management issues, including the level 1 and level 2 Strategic Flood Risk Assessments for Knowsley (see appendix 1 – strategic matter 15).

#### Civil Aviation Authority

4.12 The Knowsley Core Strategy has the potential to impact on aviation issues as a result of the proximity of Liverpool John Lennon Airport. The Civil Aviation Authority has been consulted at all stages of preparation of the Knowsley Core Strategy. Knowsley Council has been fully involved in the development

<sup>8</sup> Third Local Transport Plan for Merseyside 2011 – 2024 (Merseytravel, 2011)

<sup>9</sup> Knowsley Infrastructure Delivery Plan (Knowsley MBC, 2012)

of the Airport's master plan<sup>10</sup> for future development, the requirements of which are reflected in the Core Strategy. This includes the potential Eastern Access Transport Corridor to the south of Halewood.

#### Homes and Communities Agency (HCA)

- 4.13 The HCA is a major stakeholder in Knowsley's Core Strategy due to its role in funding housing and regeneration programmes for example in North Huyton and Kirkby and in the New Heartlands area in the neighbouring districts of Liverpool and Sefton. The HCA has been consulted in developing the Core Strategy. It has also been involved in the relevant evidence base including the Strategic Housing Market Assessment<sup>11</sup> and Economic Viability Assessment<sup>12</sup>.

#### NHS Knowsley (as the Primary Care Trust)

- 4.13 NHS Knowsley in its role as the Primary Care Trust is covered by the "duty to co-operate". This body has been consulted at all stages of the preparation of the Core Strategy. This body has also in co-operation with the Council undertaken a comprehensive Health Impact Assessment (HIA) of the Strategy, the outcomes of which have led to refinement of the policies as the Strategy has developed. Health organisations are currently undergoing rapid change as a result of the Government's reforms to the health system. As part of this process the Council has also engaged closely with the new Knowsley Health and Wellbeing Board.

#### Office of Rail Regulation and Marine Management Organisation

- 4.14 The Office of Rail Regulation and Marine Management Organisation have been formally consulted in the preparation of the Core Strategy. The Council is aware of no issues arising from this consultation.

#### Liverpool City Region Local Enterprise Partnership (LEP)

- 4.15 The Liverpool City Region LEP was formally constituted in March 2012 i.e. at a fairly late stage in preparation of the Knowsley Core Strategy. This constrained the Council's ability to involve the LEP at an earlier stage although its predecessor body (the Mersey Partnership) was consulted at earlier stages. The Council has a major role in the LEP which has included leading the preparation of the Employment and Skills strategy for the City Region. The Liverpool City Region LEP has been contacted in advance of the publication of the Core Strategy and the Council is aware of no concerns from the LEP about the emerging Core Strategy.

#### Liverpool City Region Local Nature Partnership

- 4.16 The Liverpool City Region Local Nature Partnership has yet to be formally constituted (as at November 2012). However, a Transitional Steering Group has been formed. In this context it has not been practicable for the Council to demonstrate "co-operation" with this proposed body in preparing the Core Strategy. However, members of the Transitional Steering Group have been involved for example in the preparation of the Liverpool City Region

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<sup>10</sup> Liverpool John Lennon Airport Master Plan (Liverpool Airport, 2007)

<sup>11</sup> Knowsley Strategic Housing Market Assessment (DCA, 2010)

<sup>12</sup> Knowsley Economic Viability Assessment (Keppie Massie et al, 2012)

Ecological Framework. This provides important evidence to underpin this aspect of the Strategy.

## **5. Impact on neighbouring authorities**

5.1 Whilst appendix 1 identifies, for each issue, the likely strategic impact on neighbouring authority areas, the section below summarises the issues which are considered to be most important in terms of meeting the legal tests of the "duty to co-operate" and the soundness aspects as described in the NPPF.

### Housing, jobs and Green Belt release

- 5.2 The most significant areas of cross boundary impact are considered to be the future provision for housing and jobs and the related issue of potential Green Belt release to meet some of these needs in Knowsley. As previously noted a close relationship exists in terms of housing markets and travel to work areas between Knowsley and neighbouring districts (particularly Liverpool but also other neighbouring districts). It is therefore crucially important that the scale, timing and nature of provision of new homes and jobs in Knowsley forms part of an approach which complements and will help to meet the needs of the City Region as a whole.
- 5.3 The complexity of these issues has been exacerbated by the shortage of land which exists within the current urban area in Knowsley to meet its identified needs for housing and employment development over the Core Strategy period to 2028. Having examined and dismissed other means of making up these shortfalls (such as increasing density of development within the urban area) the Council has had to address a key choice in its Core Strategy. This is either to release land from the Green Belt in Knowsley or to seek an approach whereby a portion of these future needs are met in neighbouring districts.
- 5.4 In tackling these issues it has been necessary to address in co-operation with adjacent authorities the following points:
- The availability of land across the City Region as a whole to meet needs for housing and jobs to meet the respective needs of the City Region authorities and other neighbouring districts;
  - The suitability of the land which exists to meet the specific needs of each authority; and
  - Whether there are any authorities with a "surplus" of land supply which could (as part of a demonstrably deliverable strategy) meet not only their own needs but also contribute to meeting the needs of those authorities including Knowsley which have a shortage of supply.
- 5.5 In the Core Strategy Issues and Options Paper (consulted upon in November 2009) the Council set out three options, two of which ("Option A – Urban Concentration" and "Option B-Focused Urban Regeneration") avoided release of Green Belt land in Knowsley but would have required neighbouring authorities to accommodate some of Knowsley's development needs. The third option ("Option C – Sustainable Urban Extensions") involved development of extensions to the urban area to meet Knowsley's longer term needs without the need for any neighbouring district to accommodate any of Knowsley's needs.

- 5.6 At around the same time, two other authorities (Sefton and West Lancashire) also identified that they were facing shortages of land supply in their urban areas to meet future development needs. Halton has also subsequently identified a shortage of land supply specifically to meet the housing needs of Widnes (which is north of the River Mersey and immediately adjacent to Knowsley's boundary).
- 5.7 To help decide the appropriate way forward Knowsley Council together with 6 other authorities across the City Region commissioned the Liverpool City Region "Housing and Economic Development Evidence Base Overview Study"<sup>13</sup>. This study (finalised in 2011) brought together the previously available information on land supply and requirements for both housing and employment development for each district across the City Region and its surrounding authority areas.
- 5.8 Two authorities (Liverpool and Wirral) are identified in the Overview Study as having nominal surpluses of supply of both housing and employment land. Of these Wirral is considered to be too distant from Knowsley to help meet its future development needs. The situation in relation to Liverpool is set out below.
- 5.9 Taking housing first, the "surplus" land supply which exists in Liverpool is weighted towards sites in and around the city centre which have potential mainly for flatted development, including the Liverpool Waters scheme. There is a significant risk that reliance on the surplus provision in Liverpool to meet Knowsley's shortfall of supply would not provide the appropriate mix of housing including family dwellings. There is also no evidence that a realistic trajectory of housing delivery to meet the full range of needs at the right time could be provided by relying on sites in the current urban area across Liverpool and Knowsley.
- 5.10 In the case of employment land provision there are strong commuting links between Knowsley and Liverpool. However, the Overview Study revealed only limited scope for Knowsley's needs for future employment land provision to be met in Liverpool. As with housing, no trajectory of delivery exists to demonstrate that the two Boroughs could meet their combined future employment land requirements through reliance on sites in the current urban areas.
- 5.11 Further evidence on this issue is set out in a range of supporting documents to the Knowsley Core Strategy including the technical reports entitled "Planning for Housing Growth"<sup>14</sup> and "Planning for Employment Growth"<sup>15</sup>. The co-operation which has taken place on these matters has led to the conclusion that Knowsley will not be relying on neighbouring districts to help meet its evidenced housing and employment development needs. No other authorities will rely on Knowsley to help meet their needs.
- 5.12 One neighbouring district (Sefton) has formally approached Knowsley for assistance in meeting its needs for housing and employment development.

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<sup>13</sup> The Liverpool City Region Housing and Economic Development Evidence Base Overview Study (GVA, 2011)

<sup>14</sup> Technical Report: Planning for Housing Growth in Knowsley (Knowsley MBC, 2012)

<sup>15</sup> Technical Report: Planning for Employment Growth in Knowsley (Knowsley MBC, 2012)

Knowsley Council has taken the view that, although such an approach would help address population retention issues in Knowsley, in order to help Sefton meet its needs would have required further Green Belt release in Knowsley. It would have been difficult to present a robust case for pursuing this approach and therefore Knowsley Council responded to Sefton to confirm that it does not wish at the present time to assist in this regard.

#### The joint approach to Green Belt release

- 5.13 Having established that a review of Green Belts is necessary to meet Knowsley's future development needs it has also been necessary to engage with neighbouring districts in relation to the way in which the review has been undertaken.
- 5.14 To address this, Knowsley and Sefton have undertaken a joint Green Belt Study. West Lancashire has undertaken a similar study to the same methodology. The outcome of this co-operation has been that the three authorities who have faced the most severe shortages of future land supply have had a consistent approach to identifying the most appropriate locations for release of land from the Green Belt.
- 5.15 A further key issue has been the need to agree the trigger mechanisms which will govern the release of Green Belt sites, including the amount of land released at any one time, phasing and the need to ensure any given proposal for release of Green Belt land avoids prejudicing the urban regeneration priorities of Knowsley or neighbouring districts. Policy CS5 of the Core Strategy is crucial here. In response to points made earlier by neighbouring authorities this policy, whilst linking the release of Green Belt land in Knowsley to the maintenance of a sufficiently flexible 5 year land supply in Knowsley (both for housing and employment development), also establishes that account will be taken of any cross boundary regeneration priorities when assessing the timing of development within areas released from the Green Belt.

#### Gypsies and Travellers accommodation

- 5.16 As set out in appendix 1, the existing evidence on gypsy and traveller needs has been prepared jointly with three other authorities<sup>16</sup>. At present there is no intention for Knowsley to accommodate the needs of any adjacent authority or vice versa. However, a need has been identified to keep the evidence on this issue up to date on a joint basis with neighbouring authorities.

#### Town Centres and Retail issues

- 5.17 The town centres and retail strategy set out in policy CS6 of the Core Strategy is intended to strengthen the current performance of Knowsley's three town centres (Huyton, Kirkby and Prescott) the catchment areas of which currently "leak" a large proportion of expenditure to larger centres and retail parks in surrounding districts, particularly Liverpool. The key issue here has been to establish a level of growth which will strengthen these centres whilst remaining complementary to the role of Liverpool City Centre and other larger centres such as St Helens.

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<sup>16</sup> Merseyside Gypsy and Traveller Accommodation Assessment (SHUSU, 2008)

- 5.18 A further key issue has been the need to ensure the scale of retail proposed in Kirkby does not threaten that proposed in Skelmersdale town centre which is approximately 8 miles away in West Lancashire. The regeneration of Skelmersdale town centre is a key priority in the emerging West Lancashire Local Plan. Extensive co-operation has taken place to ensure an agreed approach which will allow the regeneration of both Kirkby and Skelmersdale town centres to an appropriate scale and form.

#### Strategic Infrastructure Issues

- 5.19 The Council has considered the impact of the emerging Core Strategies of Knowsley and other neighbouring districts on strategic infrastructure (e.g. transport, utilities, flood prevention, and social and cultural infrastructure). Co-operation has also been sought as part of the preparation of the Infrastructure Delivery Plan (IDP), for example to ensure that strategic sub-regional infrastructure projects are agreed and listed in the IDP.
- 5.20 Whilst no significant adverse impacts have been identified which are incapable of being mitigated in principle it is recognised that the strategic impacts of developments in Knowsley with those arising in neighbouring districts will need to continue to be monitored and addressed. The Infrastructure Delivery Plan and Local Transport Plan monitoring processes provide appropriate methods to do this. The Council has also committed to reviewing this through the Liverpool City Region District Planning Officers group and its sub-groups.

#### Cross boundary impacts arising from specific proposals for Green Belt release

- 5.21 Some of the locations proposed for review of Green Belt boundaries to meet future development needs (illustrated on the Key Diagram and referred to in Core Strategy Policy CS5 and its supporting text) are located close to the Borough boundary with neighbouring districts. This applies to:
- location 1 (Bank Lane, Kirkby) which is immediately adjacent to the boundary with Sefton and proposed for housing
  - location 4 (Edenhurst Avenue, Huyton) which is immediately adjacent to the boundary with Liverpool and proposed for housing
  - location 8 (South of Whiston) which is immediately adjacent to the boundary with St. Helens and proposed for housing
  - location 9 (Cronton Colliery and land south of M62) which is close to the boundary with St. Helens and proposed for employment.
- 5.22 Whilst the Council is aware of no site specific objections from neighbouring districts to these proposals it is recognised that co-operation will need to continue in the future to identify and mitigate any impacts on adjacent districts for example through the proposed Site Allocations and Development Policies document and subsequent development management stages. The Council is also aware of a more general concern from Liverpool City Council to ensure that Green Belt release in Knowsley does not adversely impact on regeneration priorities in Liverpool. The Council has sought to address this in

the wording of policy CS5 by recognising that the release of Green Belt locations should not undermine regeneration within the Borough and wider sub-region.

## **6 Conclusions**

- 6.1 Knowsley Council has engaged constructively, actively and on an ongoing basis in preparing its Local Plan: Core Strategy. This co-operation has covered all the strategic priorities requiring co-operation in accordance with the NPPF. A variety of means have been used to co-operate with other public bodies and the outcomes are as set out above and in appendix 1.

**APPENDIX 1)**

**CO-OPERATION ON EACH "STRATEGIC MATTER"**

Terminology in Appendix 1)

KMBC	Knowsley Metropolitan Borough Council
Neighbouring authorities	Halton, Liverpool, Sefton, St. Helens and West Lancashire
LCC	Lancashire County Council
LCR Authorities	Liverpool City Region Authorities (Halton, Knowsley, Liverpool, Sefton, St. Helens, Wirral)
"DtC" bodies	"Duty to Co-operate" bodies
Merseyside	Liverpool, Sefton, St. Helens, Wirral and Knowsley
HCA	Homes and Communities Agency
RSS	Regional Spatial Strategy
LEP	Local Enterprise Partnership
NPPF	National Planning Policy Framework
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
GTAA	Gypsy and Traveller Accommodation Assessment

<b>STRATEGIC MATTER 1)</b>	<b>THE LEVEL OF HOUSING GROWTH REQUIRED IN KNOWSLEY RELATIVE TO NEIGHBOURING AREAS</b>
<p><b>Reason why “duty to cooperate” triggered by this issue</b></p>	<p>Knowsley is part of a wider housing market also involving all 5 Merseyside districts plus parts of Halton and West Lancashire (as defined in the Liverpool City Region Housing Strategy<sup>17</sup>). The impact of proposed levels of housing growth in Knowsley relative to levels proposed in these neighbouring authorities had to be confirmed when preparing the Local Plan. The Plan also had to consider whether there was scope for neighbouring districts to absorb some of the shortfall of land in urban areas which exists in Knowsley in the interests of sustainable development.</p> <p>The impacts on infrastructure requirements are considered separately in strategic matters 8 to 12 below.</p>
<p><b>With which bodies is the “duty to co-operate” triggered on this issue?</b></p>	<p>LCR authorities  West Lancashire Borough Council  Cheshire West and Chester Council  Warrington Council  LCC  HCA</p>
<p><b>How has this co-operation been carried out?</b></p>	<p>The LCR authorities took a collaborative approach to agreeing the housing figures as part of the RSS process in 2006-2008. The LCR Housing Strategy established the geographical extent of housing market areas across the City Region and a commonly agreed set of priorities to guide regeneration and housing investment.</p> <p>Knowsley, Sefton and West Lancashire Councils prepared a Strategic Housing Land Availability Assessment (SHLAA) to a jointly agreed methodology in 2010, which has subsequently been updated annually in these three authorities. The SHLAA process has also included engagement with other neighbouring authorities via the Joint Knowsley, Sefton and West Lancashire Housing Market Partnership (HMP), which includes Wirral, Halton, Liverpool and St Helens. Knowsley Council has also been consulted on the SHLAAs of neighbouring districts.</p> <p>Whilst the LCR authorities have prepared Strategic Housing Market Assessments (SHMAs) on an individual authority basis these have included</p>

<sup>17</sup> Liverpool City Region Housing Strategy (TMP, 2007)

	<p>engagement with neighbouring districts as stakeholders.</p> <p>The Liverpool City Region Overview Study assessed land supply against requirements for new housing as set out in the Regional Spatial Strategy across the whole Liverpool City Region and adjoining authorities including Cheshire West and Chester and Warrington.</p> <p>The LCR authorities have formally consulted each other on emerging Local Plans including attendance at sub-regional workshops and other officer level meetings.</p>
<p><b>What have been the outcomes of this co-operation?</b></p>	<p>The proposed annual level of housing delivery in Knowsley (450 net dwelling completions per annum) is as set out in the RSS, albeit for a different Plan period (2010 to 2028 as opposed to 2003 to 2021 in the RSS).</p> <p>This target is lower than that of the Borough's neighbouring authorities (apart from West Lancashire) reflecting in part the Borough's relatively small size and the limited land supply in Knowsley's urban areas. This was taken into account when the annualised housing target was originally set in the 2008 RSS.</p> <p>The Overview Study (see above) identified that some authorities (including Knowsley, Sefton and West Lancashire) have a shortage of supply across the urban area to meet needs up to 2031 whereas others (Liverpool and Wirral) have a nominal surplus of supply. There is no evidence that the nominal surplus of capacity in these districts could contribute to meeting the needs of Knowsley as part of a demonstrably deliverable joint strategy.</p> <p>None of the neighbouring authority Local Plans propose to accommodate any of Knowsley's identified housing requirement. Knowsley does not propose to accommodate any of the housing requirements of neighbouring districts.</p> <p>Whilst achieving this level of housing development in Knowsley up to 2028 (8100 dwellings in total) will require significant levels of Green Belt release, there is an identified need to phase the release of Green Belt land in Knowsley to avoid adversely impacting on the City Region regeneration priorities.</p> <p>The technical justification for Knowsley's housing target of 450 dwellings per year (from 2010 to 2028) is set out</p>

	in the Technical Report "Planning for Housing Growth in Knowsley".
<b>Impact on neighbouring authorities/other "DtC" bodies?</b>	Under the phasing mechanism in policy CS5 "Green Belt", impacts on neighbouring authority regeneration priorities will be taken into account when assessing the timing of the granting of planning permission for new housing development in the broad locations to be removed from the Green Belt in Knowsley. This will be in the context of the over-riding requirement which is to ensure a 5 year deliverable housing land supply with appropriate additional flexibility of 5-20% is provided at all times.

<b>STRATEGIC MATTER 2)</b>	<b>THE MIX OF HOUSING TYPES AND LEVELS OF AFFORDABLE HOUSING PROVISION TO BE PLANNED FOR IN KNOWSLEY RELATIVE TO NEIGHBOURING AREAS</b>
<b>Reason why “duty to cooperate” triggered by this issue</b>	Knowsley is part of a wider housing market also involving all 5 Merseyside districts plus parts of Halton and West Lancashire (as defined in the Liverpool City Region Housing Strategy). The impact of the proposed mix of housing types and affordability in Knowsley on housing delivery and regeneration in these neighbouring authorities had to be confirmed when preparing the Local Plan.
<b>With which bodies is the “duty to co-operate” triggered on this issue?</b>	LCR authorities West Lancashire Borough Council HCA
<b>How has this co-operation been carried out?</b>	<p>The LCR Housing Strategy established the geographical extent of housing market areas across the City Region and a commonly agreed set of priorities to guide regeneration and housing investment.</p> <p>The Knowsley SHMA identified the needs for affordable housing and the mix of different sizes of dwellings required. The preparation of the SHMA involved consultation and engagement with neighbouring local authorities and the HCA. Knowsley Council has also been consulted on the SHMAs of neighbouring authorities.</p> <p>Core Strategy policies CS15 and CS17 have also been informed by the Knowsley Economic Viability Assessment. Neighbouring authorities and the HCA were actively engaged in the preparation of this.</p> <p>The LCR authorities have formally consulted each other on emerging Local Plans including attendance at sub-regional workshops and other officer level meetings.</p>
<b>What have been the outcomes of this co-operation?</b>	The Council is aware of no objections from the "DtC" bodies to the recommended levels of affordable housing provision set by Policy CS15 (up to 25% of new dwellings subject to viability on sites of 15 market dwellings and more). There is similar consensus that policy CS17 sets an appropriate approach to the mix of housing types to be delivered, building in the required policy flexibility.
<b>Impact on neighbouring authorities/other “DtC”</b>	No significant impact.

bodies?	
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<b>STRATEGIC MATTER 3)</b>	<b>THE LEVEL OF GYPSY AND TRAVELLER ACCOMMODATION IN KNOWSLEY RELATIVE TO NEIGHBOURING AREAS</b>
<b>Reason why “duty to cooperate” triggered by this issue</b>	The level of need and policy provision for sites to accommodate gypsy and travellers can only appropriately be assessed on a sub-regional basis given the mobile nature of the groups covered by this issue.
<b>With which bodies is the “duty to co-operate” triggered on this issue?</b>	LCR authorities West Lancashire Borough Council LCC HCA
<b>How has this co-operation been carried out?</b>	<p>The Merseyside Gypsy and Traveller Accommodation Needs Assessment (GTAA) was commissioned jointly by Knowsley, Liverpool, Sefton and Wirral Councils in 2008.</p> <p>The issue was also considered as part of a proposed partial review of the Regional Spatial Strategy, in which the LCR authorities participated, although this process did not proceed to adoption. The LCR authorities have formally consulted each other on emerging Local Plans including attendance at sub-regional workshops and other officer level meetings.</p>
<b>What have been the outcomes of this co-operation?</b>	<p>The findings of the Merseyside GTAA were agreed, including recommended pitch numbers in each authority. The GTAA identified a need for Knowsley to accommodate just 5 permanent pitches and a share of 10 transit pitches to be provided across the Liverpool City Region. No objections have been received from any DtC bodies to the approach in policy CS18. This identifies criteria to guide the location of sites.</p> <p>There is an acknowledged need to keep evidence of need and demand for new accommodation and related viability evidence up to date. The location of any site required in Knowsley will be identified through the future Local Plan: Site Allocations and Development Policies document.</p>
<b>Impact on neighbouring authorities/other “DtC” bodies?</b>	Knowsley Council wishes to continue working jointly with neighbouring districts to update the Merseyside GTAA evidence and the identification of any sites required.

<b>STRATEGIC MATTER 4)</b>	<b>THE AMOUNT OF LAND NEEDED FOR EMPLOYMENT IN KNOWSLEY RELATIVE TO NEIGHBOURING AREAS</b>
<b>Reason why “duty to cooperate” triggered by this issue</b>	Knowsley’s economy is inextricably linked with that of the Liverpool City Region as a whole. About 28,000 of Knowsley’s resident workforce commute out to other Boroughs to work. About 21,000 people who work in Knowsley commute in from elsewhere <sup>18</sup> .
<b>With which bodies is the “duty to co-operate” triggered on this issue?</b>	LCR authorities West Lancashire Borough Council LCC Homes and Communities Agency Liverpool City Region LEP
<b>How has this co-operation been carried out?</b>	<p>Four authorities (Halton, Knowsley, Sefton and West Lancashire) commissioned the Joint Employment Land and Premises<sup>19</sup> This study assessed the availability and requirements for new employment development across the four authority areas up to 2026</p> <p>The Liverpool City Region Housing and Economic Development Evidence Base Overview Study was commissioned jointly by 7 local authorities across the City Region (including the 6 LCR authorities and West Lancashire and also closely involved authorities in a wider area including Cheshire West and Cheshire and Warrington). The study assessed all housing and employment evidence collated by individual districts (in SHLAAs, Employment Land Studies and Strategic Housing Market Assessments). The study assessed the ability of each district to meet its requirements (including a share of the sub-regional target from the RSS) for employment for an extended period up to 2031 and whether there was scope for those authorities with a nominal surplus of supply (Liverpool and Wirral) to accommodate some of the employment development needs of those authorities which have a shortage (which included Knowsley, Sefton and West Lancashire districts).</p> <p>The Overview Study compared the methodology followed by previous Employment Land and Premises Studies to facilitate a consistent approach across the City Region.</p> <p>The LCR authorities have formally consulted each other</p>

<sup>18</sup> The figures in this paragraph are sourced from the Census 2001

<sup>19</sup> Joint Employment Land and Premises Study (BE Group, 2010)

	<p>on emerging Local Plans including attendance at sub-regional workshops and other officer level meetings.</p>
<p><b>What have been the outcomes of this co-operation?</b></p>	<p>Core Strategy Policy CS4 states that 183.5 hectares of employment land will be identified in Knowsley. Taking account of the Overview Study and other economic factors (see the Technical Report – “Planning for Employment Growth” for further details), this target has been adjusted downwards from that in the previous Joint Employment Land and Premises Study.</p> <p>The Knowsley Core Strategy does not make any provision to meet the employment land needs of any neighbouring districts. No reliance is placed on any neighbouring districts to meet Knowsley’s employment land needs.</p> <p>Whilst achieving the proposed level of employment development in Knowsley up to 2028 will require release of land in the Green Belt, there is an identified need to phase the release of Green Belt sites in Knowsley to avoid adversely impacting on the City Region regeneration priorities.</p>
<p><b>Impact on neighbouring authorities/other “DtC” bodies?</b></p>	<p>The distribution of employment land in Knowsley has been directed towards the most sustainable and accessible existing employment locations. This approach should minimise impact upon neighbouring authorities.</p> <p>Under the phasing mechanism in policy CS5 “Green Belt”, impacts on neighbouring authority regeneration priorities will be taken into account when assessing the timing of the granting of planning permission for new employment development in the broad locations to be removed from the Green Belt in Knowsley. This will be in the context of the over-riding requirement which is to ensure a 5 year deliverable land supply with appropriate additional flexibility to provide a range of sites of appropriate size, location and quality is provided at all times.</p>

<b>STRATEGIC MATTER 5)</b>	<b>THE APPROACH TO REVIEWING GREEN BELT BOUNDARIES IN KNOWSLEY TO MEET DEVELOPMENT NEEDS</b>
<p><b>Reason why “duty to cooperate” triggered by this issue</b></p>	<p>Approximately 54% of Knowsley’s land area is currently designated as Green Belt. This forms part of the Merseyside Green Belt which has (for nearly 30 years) played an important role in containing the spread of urban areas and focussing development into areas requiring regeneration.</p> <p>As mentioned in relation to strategic matters 1) and 4) above, if Knowsley is to meet its assessed requirements for housing and employment development up to 2028 there will need to be a review of Green Belt boundaries. All other means of making up the shortfalls of land to meet these needs have been considered (see Technical Reports on “Planning for Housing Growth in Knowsley” and “Planning for Employment Growth in Knowsley” for further details).</p> <p>Given the strategic role of Knowsley’s Green Belt it is important that neighbouring districts and other DtC bodies are involved closely in the way in which the review is carried out. This includes considering whether the review should seek to include significant “safeguarded” land for post 2028 needs (as advised by the NPPF) or limited to primarily to meeting Knowsley’s needs in the Plan period pending a more strategic review across a broader area to meet longer term needs.</p>
<p><b>With which bodies is the “duty to co-operate” triggered on this issue?</b></p>	<p>LCR authorities West Lancashire Council LCC HCA</p>
<p><b>How has this co-operation been carried out?</b></p>	<p>The need for a review of Green Belt boundaries in parts of the City Region (specifically Knowsley, Sefton and West Lancashire) was identified in 2009. Discussions at that time sought views on whether a sub-regional Green Belt review across the whole City Region could be undertaken. However, the other districts were not in a position to support such a strategic review. The Liverpool City Region Housing and Economic Development Evidence Base Overview Study (2011) was however commissioned, the role and findings of which are discussed in relation to strategic matters 1) and 4) above.</p>

	<p>Those districts which had identified a potential shortage of land supply to meet their Plan period needs (Knowsley, Sefton and West Lancashire) decided to proceed with local reviews to ensure their Local Plans could accommodate sufficient levels of development and thereby comply with the "tests of soundness". The Knowsley and Sefton Green Belt Study has been undertaken as a joint study whereas that for West Lancashire has been completed as a separate study but to a broadly common methodology. Subsequently a fourth district (Halton) has also identified a need to review Green Belt boundaries to meet future housing needs for Widnes. Knowsley Council proposes to co-operate with Halton on this issue as this review proceeds.</p> <p>The Knowsley and Sefton Green Belt study has included stakeholder engagement with other neighbouring authorities (including those not reviewing their Green Belts) and other DtC bodies. This engagement was in the form of 2 "stakeholder workshops" which were used to develop and refine the study's draft methodology and formal public consultation on a draft of the Study alongside the Knowsley Core Strategy Preferred Options Report in summer 2011.</p> <p>The LCR authorities have formally consulted each other on emerging Local Plans including attendance at sub-regional workshops and other officer level meetings.</p>
<p><b>What have been the outcomes of this co-operation?</b></p>	<p>In response to the Preferred Options consultation in summer 2011 Halton BC submitted detailed comments concerning the method used and potential effects on a future review of Green Belt boundaries around Widnes. Detailed changes have been made to the Green Belt study to address this issue.</p> <p>Liverpool CC submitted comments which for example queried whether further capacity existed in the urban area to meet Knowsley's development needs and concerning the trigger mechanisms by which land would be released from the Green Belt in Knowsley. As mentioned in relation to strategic matters 1 and 4, policy CS5 requires that in assessing the timing of release of Green Belt sites, consideration is given to the impact on sub-regional regeneration priorities.</p> <p>Discussions have taken place to resolve these concerns. No other objections have been received from</p>

	<p>DtC bodies to the way in which Knowsley is reviewing its Green Belt boundaries.</p> <p>Whilst the Plan includes some “safeguarded land” and an allowance within the estimated development capacities to contribute to post 2028 needs, the Council acknowledges the difficulties of identifying further safeguarded land in advance of a future sub-regional review of housing and employment targets and of Green Belts within the City Region. Further details on this are set out in policy CS5 and its supporting text, the Knowsley and Sefton Green Belt study and the Technical Report “Green Belt”.</p>
<p><b>Impact on neighbouring authorities/other “DtC” bodies?</b></p>	<p>The review of Green Belt boundaries has been undertaken in a way which maximises consistency of approach with those neighbouring districts that (like Knowsley) are facing shortfalls of land supply for development over their Local Plan/Core Strategy plan periods.</p>

<b>STRATEGIC MATTER 6)</b>	<b>ANY CROSS BOUNDARY IMPACTS ARISING FROM SPECIFIC BROAD LOCATIONS PROPOSED FOR GREEN BELT RELEASE</b>
<b>Reason why “duty to cooperate” triggered by this issue</b>	<p>Some of the proposed locations for review of Green Belt boundaries (particularly locations 1,4,7,8 and 9 as identified on the key diagram) are located close to neighbouring districts. Some locations put forward by objectors to the Core Strategy as “alternative locations” to be considered in the process are also close to the Borough boundaries.</p> <p>There is a need to ensure the specific locations chosen are coherent alongside the Local Plans of neighbouring districts. The specific locations also impact on the role of other “DtC” bodies for example through local environmental impacts and infrastructure requirements.</p>
<b>With which bodies is the “duty to co-operate” triggered on this issue?</b>	<p>Neighbouring local planning authorities HCA Environment Agency English Heritage Natural England Local highway authorities Merseytravel Neighbouring highway authorities</p>
<b>How has this co-operation been carried out?</b>	<p>The review of Green Belt boundaries in Knowsley has been undertaken to a common method with Sefton and West Lancashire districts. The identification of the preferred locations and the development capacity in these has taken account of the Strategic Flood Risk Assessment<sup>20</sup> (level 1 and level 2 studies). The Environment Agency has been involved as a key stakeholder in these studies. The process of identifying preferred locations has also been informed by the Transport Feasibility Study<sup>21</sup> and Transport Modelling Study<sup>22</sup> in which Merseytravel were closely involved.</p> <p>The LCR authorities have formally consulted each other on emerging Local Plans including attendance at sub-regional workshops and other officer level meetings. The other DtC bodies relevant to this issue have also been formally consulted at each stage.</p>
<b>What have been the</b>	The preferred broad locations for Green Belt release

<sup>20</sup> Need references

<sup>21</sup> Transport Feasibility Study (AECOM, 2012)

<sup>22</sup> Transport Modelling Study (Mott MacDonald, 2012)

<p><b>outcomes of this co-operation?</b></p>	<p>are those identified on the Key Diagram and in paragraph 5.50 of the Local Plan: Core Strategy Proposed Submission Document. The assumed development capacities within these areas have been adjusted to take account of flood risk affecting relatively small parts of some of the locations proposed. The transport studies referred to above have also been taken into account in determining the locations and assessing their development capacity.</p>
<p><b>Impact on neighbouring authorities/other “DtC” bodies?</b></p>	<p>No significant adverse impacts on the emerging Local Plans of neighbouring districts arising from the specific preferred locations for Green Belt release have been identified.</p> <p>The selection of the preferred locations has taken account of Green Belt areas immediately across the Borough boundary in Liverpool and other neighbouring districts.</p>

<b>STRATEGIC MATTER 7)</b>	<b>THE STRATEGIC ROLE OF KNOWSLEY'S TOWN CENTRES (HUYTON, KIRKBY AND PRESCOT) RELATIVE TO CENTRES IN NEIGHBOURING DISTRICTS</b>
<b>Reason why “duty to cooperate” triggered by this issue</b>	Knowsley’s townships form large suburban areas. The three town centres (Huyton, Kirkby and Prescott) have an important role in the provision of local services, but also fall within the influence of larger centres in neighbouring districts, particularly Liverpool. The strategic role of the centres within the City Region and the levels of retail growth proposed in each needed to be confirmed as part of the Local Plan process.
<b>With which bodies is the “duty to co-operate” triggered on this issue?</b>	Neighbouring local planning authorities LCC HCA
<b>How has this co-operation been carried out?</b>	<p>The LCR authorities took a collaborative approach to agreeing the role of suburban centres as part of the RSS process in 2006-2008. Although the RSS does not individually name the centres it confirms in policy RDF1 that larger suburban centres (a description which undoubtedly applies to Huyton, Kirkby and Prescott) form third tier centres. Regeneration will be encouraged in these centres which complements that in the larger centres in the City Region, particularly where it tackles deprivation and worklessness issues.</p> <p>The Knowsley Town Centres and Shopping Study considers the proposed role of the three town centres which focus on meeting needs arising within the local catchment areas of the centres. The Study was placed in the public domain as key evidence at an early stage in the Plan process.</p> <p>The LCR authorities have formally consulted each other on emerging Local Plans including attendance at sub-regional workshops and other officer level meetings.</p> <p>In response to consultation at Preferred Options stage, West Lancashire Council raised concerns regarding the scale of retail development in Kirkby town centre. This level has been revised in the Proposed Submission Document of the Local Plan to a lower figure, with justification for the approach provided in the Technical Report: Planning for Retail in Knowsley.</p> <p>The HCA has been involved as a stakeholder in the Kirkby town centre regeneration proposals which involve the replacement of about 70 existing houses</p>

	provided by Registered Providers.
<b>What have been the outcomes of this co-operation?</b>	The levels of retail growth proposed in Huyton, Kirkby and Prescot town centres have been adjusted (downwards in the case of Kirkby) following the Preferred Options stage for reasons which are set out in the Technical Report "Planning for Retail Growth in Knowsley".
<b>Impact on neighbouring authorities/other "DtC" bodies?</b>	The levels of retail and other commercial growth in Knowsley's town centres have been set at a level which is appropriate to meet the needs of their local catchment areas.

<b>STRATEGIC MATTER 8)</b>	<b>THE IMPACTS OF THE CORE STRATEGY ON TRANSPORT INFRASTRUCTURE IN THE LIVERPOOL CITY REGION</b>
<p><b>Reason why “duty to cooperate” triggered by this issue</b></p>	<p>The cumulative impacts of the proposed levels of development on the strategic transport network in the Liverpool City Region needed to be considered. This also needed to include consideration of the impacts of neighbouring authorities’ Local Plans and of strategic infrastructure projects in the City Region including:</p> <ul style="list-style-type: none"> <li>• the Liverpool Super Port proposals;</li> <li>• the proposed expansion of Liverpool John Lennon Airport (see strategic matter 10 below);</li> <li>• the Mersey Gateway bridge linking Widnes with Runcorn;</li> <li>• strategic rail infrastructure including the electrification of the Liverpool-Manchester rail line;</li> <li>• Line 1 of the Merseytram project (subject to funding availability).</li> </ul> <p>Some of these projects affect land in Knowsley whereas others (e.g. SuperPort) are outside the Borough but could impact on the Borough’s transport infrastructure. These projects, and others, are outlined within the Infrastructure Delivery Plan and recognised as strategic sub-regional infrastructure projects.</p>
<p><b>With which bodies is the “duty to co-operate” triggered on this issue?</b></p>	<p>Neighbouring local planning and highway authorities LCC</p>
<p><b>How has this co-operation been carried out?</b></p>	<p>The Council has formally consulted transport infrastructure providers while preparing the Local Plan. The consultation has also included the Infrastructure Delivery Plan, a draft of which was made available at Preferred Options consultation stage.</p> <p>The Merseyside Local Transport Plan provides a long term strategy and delivery programme of transport investment up to 2024. As part of the process of preparing the Local Transport Plan the planning authorities from Merseyside fed in their assumptions of housing and employment growth from their respective housing and employment databases which also inform the Local Plans. This was to ensure that investment decisions affecting the transport network in the period covered by the Local Transport Plan (up to 2024) took account of the growth and development aspirations of</p>

	<p>the Merseyside districts in their emerging Local Plans.</p> <p>The Liverpool City Region Transport Model (LCRTM) has been developed by Mott McDonald on behalf of the Merseyside Integrated Transport Authority (Merseytravel). Knowsley Council has commissioned two transport studies to inform its Core Strategy both of which use the model outputs to predict the impacts of the Core Strategy on the transport network. The “Knowsley Local Plan Core Strategy Transport Modelling” study (Mott MacDonald, 2012) considered the outputs at a strategic scale whereas the Knowsley Local Plan Transport Feasibility Study (AECOM, 2012) is a more detailed assessment at a site specific level. The Highways Agency and Merseytravel were involved as stakeholders in this work.</p> <p>The LCR authorities have formally consulted each other on emerging Local Plans including attendance at sub-regional workshops and other officer level meetings.</p>
<p><b>What have been the outcomes of this co-operation?</b></p>	<p>The Council’s approach towards transport issues is in policy CS7, and towards planning and paying for infrastructure provision in policy CS27. The Council is aware of no outstanding objections from transport providers, Merseytravel or other authorities to the approach of the Plan to these issues.</p> <p>The two transport studies mentioned above have confirmed that the bulk of the growth of traffic on the strategic transport network in Knowsley is likely to be due to background traffic growth. Additional pressures on the capacity of the transport network arising from the Knowsley Local Plan: Core Strategy will mainly be of a localised nature. Any necessary mitigation measures will be taken into account in the infrastructure planning process moving forward including the approach to developer contributions and infrastructure provision in policy CS27.</p>
<p><b>Impact on neighbouring authorities/other “DtC” bodies?</b></p>	<p>Additional traffic pressures (e.g. on the M62 and M57) are likely to be relatively minor compared to background traffic growth. Localised pressures on transport infrastructure arising from development proposals within individual sites will be dealt with via the Council’s approach to infrastructure planning and provision in policy CS8 and CS27.</p>

<b>STRATEGIC MATTER 9)</b>	<b>THE IMPACTS OF THE CORE STRATEGY ON OTHER FORMS OF INFRASTRUCTURE (E.G. UTILITIES) IN THE LIVERPOOL CITY REGION</b>
<b>Reason why “duty to cooperate” triggered by this issue</b>	The cumulative impacts of the proposed levels of development (alongside those in neighbouring districts) on infrastructure such as water supply, sewerage, and energy provision needed to be considered.
<b>With which bodies is the “duty to co-operate” triggered on this issue?</b>	Neighbouring local planning authorities Environment Agency
<b>How has this co-operation been carried out?</b>	<p>The Council has consulted infrastructure providers while preparing the Local Plan. In addition to the DtC bodies this has included providers such as United Utilities, gas and electricity providers, transport providers, and the Mobile Operators Association (represented by Mono Consultants). The consultation has also included the Infrastructure Delivery Plan, a draft of which was made available at Preferred Options consultation stage for comments.</p> <p>Flood prevention infrastructure was considered as part of the Strategic Flood Risk Assessment – level 1 and 2 studies, in both of which the Environment Agency has been heavily involved.</p> <p>The LCR authorities have formally consulted each other on emerging Local Plans including attendance at sub-regional workshops and other officer level meetings.</p>
<b>What have been the outcomes of this co-operation?</b>	<p>The Council’s approach towards planning and paying for infrastructure provision are set out in policy CS27. The Council is aware of no objections from the infrastructure providers or other authorities to the approach of the Plan to these issues.</p> <p>Any necessary mitigation measures will be taken into account in the infrastructure planning process moving forward including the approach to developer contributions and infrastructure provision in policy CS27.</p>
<b>Impact on neighbouring authorities/other “DtC” bodies?</b>	No significant impacts on the strategic infrastructure affecting neighbouring authorities have been identified. Localised pressures on infrastructure arising from development proposals within individual sites will be dealt with via the Council’s approach to infrastructure planning and provision set out in policy CS27.

<b>STRATEGIC MATTER 10)</b>	<b>THE POTENTIAL FUTURE EXPANSION OF LIVERPOOL JOHN LENNON AIRPORT</b>
<b>Reason why “duty to cooperate” triggered by this issue</b>	Liverpool John Lennon Airport is a key asset for the City Region. The Airport is located just outside the Borough boundary in Liverpool. The Liverpool John Lennon Airport Master Plan includes proposals to expand the Airport’s capacity, including a new access corridor which would join the A562 near to the Knowsley / Liverpool / Halton boundary near to Halewood.
<b>With which bodies is the “duty to co-operate” triggered on this issue?</b>	LCR authorities (Halton, Liverpool and Wirral) Civil Aviation Authority
<b>How has this co-operation been carried out?</b>	<p>Knowsley Council and the Civil Aviation Authority have been involved as a key stakeholder in the development of the Liverpool John Lennon Airport Master Plan and Surface Access Strategy.</p> <p>The CAA and other authorities affected by the Airport proposals and its flight paths (Halton, Liverpool and Wirral) have been formally consulted on the emerging Local Plan including in the case of the authorities attendance at sub-regional workshops and other officer level meetings.</p>
<b>What have been the outcomes of this co-operation?</b>	The future expansion of the Airport is identified as a key priority in policy CS7 of the Core Strategy. The provision of the Eastern Access Transport Corridor for the Airport is identified as a key priority for the Halewood area in chapter 6 of the Plan.
<b>Impact on neighbouring authorities/other “DtC” bodies?</b>	The Plan makes appropriate provision to support the future expansion of Liverpool John Lennon Airport.

<b>STRATEGIC MATTER 11 )</b>	<b>THE IMPACTS OF THE PLAN ON STRATEGIC HEALTH PROVISION (E.G. WHISTON HOSPITAL), COMMUNITY AND CULTURAL INFRASTRUCTURE IN THE CITY REGION</b>
<b>Reason why “duty to cooperate” triggered by this issue</b>	<p>Whiston Hospital provides specialist health services across a wide area of the North West and North Wales. It was important to establish any impacts of the Plan on the Hospital and also on other strategic security, community and cultural infrastructure in the City Region such as the major cultural offer in Liverpool e.g. through increased pressure of usage.</p>
<b>With which bodies is the “duty to co-operate” triggered on this issue?</b>	<p>Neighbouring local planning authorities NHS Knowsley</p>
<b>How has this co-operation been carried out?</b>	<p>Neighbouring local authorities and NHS Knowsley have been consulted at all stages of preparation of the Core Strategy. NHS Knowsley has also been involved in the infrastructure delivery plan process.</p> <p>The Plan has been subject to a robust process of Health Impact Assessment as it has been prepared, involving the Knowsley Public Health team. Engagement has taken place with the new Health and Wellbeing Board.</p>
<b>What have been the outcomes of this co-operation?</b>	<p>The Plan’s approach to planning and paying for the forms of infrastructure covered by this issue are set out in policy CS27.</p> <p>Revisions to the Plan policies have been made as a result of the Health Impact Assessment process (see “Accounting for Assessments” document). These include the insertion of a new strategic objective 9 which specifically addresses health issues.</p>
<b>Impact on neighbouring authorities/other “DtC” bodies?</b>	<p>The Council is aware of no significant impacts that the Core Strategy would have on strategic health, security, community or cultural infrastructure which cannot be mitigated.</p>

<b>STRATEGIC MATTER 12)</b>	<b>THE IMPACT OF THE STRATEGY ON THE LOW CARBON INFRASTRUCTURE POTENTIAL OF THE LIVERPOOL CITY REGION</b>
<b>Reason why “duty to cooperate” triggered by this issue</b>	“Low Carbon” economy is one of the four priorities of the Liverpool City Region Local Enterprise Partnership. Knowsley Industrial Park has been identified as having strategic potential for development of low carbon energy technologies.
<b>With which bodies is the “duty to co-operate” triggered on this issue?</b>	Neighbouring local planning authorities HCA Liverpool City Region LEP
<b>How has this co-operation been carried out?</b>	<p>The 6 LCR authorities (plus Warrington) completed an Energy Options Study<sup>23</sup> which Identified potential priority areas for renewable and low carbon energy infrastructure. This, alongside earlier work commissioned by Knowsley Council has confirmed the potential to develop a strategic district heating network at Knowsley Industrial Park. It has also confirmed that Knowsley has a relatively limited potential for on shore wind generation compared to other places in the North West.</p> <p>The results of this work have fed into a strategic regeneration framework, Delivering a New Future for Knowsley Industrial Park: Strategic Framework<sup>24</sup> and technical feasibility study<sup>25</sup>.</p> <p>The Liverpool City Region authorities have recently (in 2012) agreed a Sustainable Energy Action Plan which identifies key low carbon energy actions to be delivered across the City Region. The LCR authorities have formally consulted each other on emerging Local Plans including attendance at sub-regional workshops and other officer level meetings.</p>
<b>What have been the outcomes of this co-operation?</b>	In accordance with the evidence base studies mentioned above no areas are earmarked for wind generation in Knowsley. Policies CS11 and CS23 of the Local Plan: Core Strategy support the provision of a district heating network at Knowsley Industrial Park.
<b>Impact on neighbouring authorities/other “DtC”</b>	Development of a district energy network at Knowsley Industrial and Business Parks is a low carbon and

<sup>23</sup> Renewable Energy Options Study Liverpool City Region Stage 1 and 2 (Arup, 2010)

<sup>24</sup> Delivering a New Future for Knowsley Industrial Park: Strategic Framework (DTZ, Taylor Young and Arup, 2011)

<sup>25</sup> Knowsley Industrial Park Energy Network Feasibility Study (Arup, 2012)

**bodies?**

renewable energy project of sub-regional significance. It will also help to deliver the LCR Sustainable Energy Action Plan<sup>26</sup>, specifically Action 3, which relates to “Energy Supply”.

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<sup>26</sup> Liverpool City Region Sustainable Energy Action Plan – 1<sup>st</sup> Edition (

<b>STRATEGIC MATTER 13)</b>	<b>THE IMPACT OF THE STRATEGY ON GREEN INFRASTRUCTURE IN THE LIVERPOOL CITY REGION</b>
<b>Reason why “duty to cooperate” triggered by this issue</b>	Knowsley contains important strategic greenspaces such as the Knowsley Hall Estate and a number of strategic green links, some of which link to neighbouring Boroughs. The contribution of these assets (both existing and in the future) to biodiversity, recreational and leisure provision in the City Region had to be established.
<b>With which bodies is the “duty to co-operate” triggered on this issue?</b>	Neighbouring local planning authorities Natural England Environment Agency English Heritage
<b>How has this co-operation been carried out?</b>	<p>The LCR authorities have formally consulted each other on emerging Local Plans including attendance at sub-regional workshops and other officer level meetings.</p> <p>English Heritage and English Nature have been consulted as key stakeholders at all stages of preparation of the Strategy.</p> <p>The Liverpool City Region authorities have been collaborating in the preparation of a Green Infrastructure Framework (although this work has to be completed). They have also agreed an Ecological Framework which provides a common evidence base and strategy concerning the City Region’s key ecological assets.</p> <p>Sport England has (although not a "DtC" body) been extensively involved in the preparation of the Council's Playing Pitches Assessment and Strategy.</p>
<b>What have been the outcomes of this co-operation?</b>	<p>The strategic green infrastructure in Knowsley is shown on the key diagram in chapter 5 and for each township area in chapter 6 of the Core Strategy. The approach to protecting and enhancing this resource is in policy CS8.</p> <p>The Council is aware of no major outstanding concerns from any of the DtC bodies on these issues.</p>
<b>Impact on neighbouring authorities/other “DtC” bodies?</b>	The strategic Green Infrastructure assets in Knowsley will continue to contribute positively to the Liverpool City Region.

<b>STRATEGIC MATTER 14)</b>	<b>THE IMPACT OF THE STRATEGY ON PROTECTED NATURAL HABITATS INCLUDING THOSE IN NEIGHBOURING DISTRICTS PROTECTED BY EUROPEAN LEGISLATION</b>
<b>Reason why “duty to cooperate” triggered by this issue</b>	<p>Whilst Knowsley does not contain any sites which have national or European designations, it does contain a number of Local Wildlife Sites and also priority habitat types.</p> <p>Neighbouring districts contain sites which are designated at a European level for their natural and wildlife importance, for example the Mersey Marshes. The impact of the Core Strategy on these sites needed to be established and mitigated.</p>
<b>With which bodies is the “duty to co-operate” triggered on this issue?</b>	<p>Neighbouring local planning authorities English Nature</p>
<b>How has this co-operation been carried out?</b>	<p>English Nature has been consulted at all stages on the emerging Local Plan. The LCR authorities have formally consulted each other on emerging Local Plans including attendance at sub-regional workshops and other officer level meetings.</p> <p>4 authorities (Halton, Knowsley, Liverpool, and Wirral) have jointly commissioned, through the Merseyside Environmental Advisory Service, Habitats Regulation Assessments. This has, for each authority, assessed the impacts of the emerging Local Plans/Core Strategies at each stage of Plan preparation on sites designated at a European level for their natural/wildlife significance. This process has also resulted in mitigation measures being recommended.</p>
<b>What have been the outcomes of this co-operation?</b>	<p>Minor amendments have been made to the Core Strategy to account for the recommendations of the Habitats Regulation Assessment.</p>
<b>Impact on neighbouring authorities/other “DtC” bodies?</b>	<p>The Council is aware of no outstanding aspects of the Plan which will have any significant impact on these sites.</p>

<b>STRATEGIC MATTER 15)</b>	<b>THE IMPACT OF THE STRATEGY ON WATER MANAGEMENT ISSUES INCLUDING FLOODING</b>
<b>Reason why “duty to cooperate” triggered by this issue</b>	Most of Knowsley is in the catchment area of the River Alt. This river flows through the neighbouring district of Sefton into Liverpool Bay. Whilst a very small proportion of Knowsley's area is subject to flood risk it was important to demonstrate that development in Knowsley would not adversely affect flooding in Sefton.
<b>With which bodies is the “duty to co-operate” triggered on this issue?</b>	Neighbouring local authorities Environment Agency
<b>How has this co-operation been carried out?</b>	<p>Knowsley and Sefton Councils jointly commissioned a level 1 flood risk assessment in 2009. This study and a subsequent Knowsley specific level 2 assessment (carried out in 2012) have also closely involved the Environment Agency.</p> <p>These studies have recommended approaches to policy in the Core Strategy which will mitigate any adverse impacts on flooding or on the wider management of river systems.</p>
<b>What have been the outcomes of this co-operation?</b>	<p>With appropriate controls in place the proposed levels of development in Knowsley can be accommodated without significantly affecting flood risk in Sefton or any other neighbouring districts. These controls are set out in policy CS24 of the Core Strategy "Managing Flood Risk".</p> <p>The assumed development capacities in some of the locations proposed for removal from the Green Belt (in policy CS5) has been adjusted downwards following the exclusion of areas at Moderate or higher risk of flooding<sup>27</sup> (this broadly equates to EA Flood Zones 2 and 3), This takes account of the flood risk which affects parts of some of these sites.</p>
<b>Impact on neighbouring authorities/other “DtC” bodies?</b>	The Council is aware of no outstanding concerns from neighbouring districts or the Environment Agency to the aspects of the Strategy concerning flood risk.

<sup>27</sup> As identified by the SFRA Level 2.

<b>STRATEGIC MATTER 16)</b>	<b>THE SAFEGUARDING OF MINERALS RESOURCES</b>
<b>Reason why “duty to cooperate” triggered by this issue</b>	Knowsley contains reserves of coal and brick clay. It is important that any impacts of the Core Strategy on the future sub-regional supply of these minerals is identified and addressed.
<b>With which bodies is the “duty to co-operate” triggered on this issue?</b>	LCR authorities Warrington Council Greater Manchester authorities
<b>How has this co-operation been carried out?</b>	<p>Merseyside Environmental Advisory Service (MEAS), on behalf of the 6 Merseyside Authorities (including Knowsley) contracted Greater Manchester Geological Unit (GMGU), part of the Urban Vision Partnership, to establish a minerals evidence base<sup>28</sup> to support the development of a minerals policy framework.</p> <p>Knowsley participates in the managed aggregate supply system by participating in the North West Aggregate Working Party (NWAAP). Together with the other authorities of Merseyside, it is within an aggregate apportionment sub-region with Warrington and the Greater Manchester authorities and, in accordance with para. 145 of the NPPF, is working with them to deliver a joint Local Aggregate Assessment.</p>
<b>What have been the outcomes of this co-operation?</b>	Policy CS25 of the Core Strategy entitled "Management of Mineral Resources" sets out the Council's approach to facilitating a steady and adequate supply of minerals including the safeguarding of viable mineral deposits and ensures Knowsley contributes to meeting sub-regional needs <sup>29</sup>
<b>Impact on neighbouring authorities/other “DtC” bodies?</b>	The Council is aware of no outstanding concerns from other authorities to the approach to minerals safeguarding in the Core Strategy.

<sup>28</sup> Evidence Base for Minerals Planning in Merseyside (Urban Vision, 2008)