



26 August 2014

Local Plan Team
Knowsley Council
1st Floor Annexe
Municipal Buildings
Archway Road
Huyton
Merseyside
L36 9YU

Our Ref: D131407

Dear Sir / Madam,

HRA of Further Modifications to the Knowsley Local Plan Core Strategy August 2014

The submitted Local Plan Core Strategy was subjected to full HRA in 2012. An HRA was completed in June 2014 following changes made. Since that time a series of further modifications (August 2014) to the plan have been proposed. It is therefore necessary for these proposed changes to be subjected to HRA analysis in order to determine whether they would alter any of the conclusions previously reached regarding the HRA of the Local Plan Core Strategy, or introduce any new impacts/effects. Changes that are solely concerned with clarifying wording in diagrams or supporting text in the Plan are not discussed below as these would not present any mechanism for the Local Plan Core Strategy to affect European sites.

The analysis therefore focusses on 'substantive' changes which in the context of HRA mean 'main' modifications proposed to policies. The analysis of these proposed modifications is presented in Table 1. As with the schedule of proposed modifications itself, this analysis is not intended as a stand-alone document but should be read in conjunction with the HRA of the submitted Local Plan Core Strategy. As such, it does not seek to comprehensively recap all the issues and analyses that were covered in that document but specifically seeks to identify any issues with the proposed modifications.

The most recent amendments are largely for clarity and clarification and to ensure consistency within the Core Strategy and with Government policies. There are no further modifications within the August 2014 document that have pathways of impacts upon the internationally designated Natura 2000 sites.

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It is concluded that there would be no introduction or exacerbation of likely significant effects on European sites as a result of further modifications as per the Provisional Schedule for Further Modifications to the Submitted Document (August 2014).

Yours sincerely
for **URS Infrastructure & Environment UK Limited**



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Table 1. HRA analysis of Modifications to policies

Modification number	Modification	Likely Significant Effect (LSE)?
Chapter 5		
M055	Policy CS3, clause 3 – To clarify that land for SUE developments will be released subject to the requirements of policies CS5, SUE1 and SUE2c. Footnote 75 amendment relating to allowing for a 'shortfall' accrued against the target from 2010 onwards.	Minor rewording of policy text to clarify intent and therefore no LSE arises.
MO56A	Paragraph 5.18 – referring to 'five years' rather than a 'remaining plan period'.	Minor rewording of text to clarify intent and therefore no LSE arises.
MO56B	Paragraph 5.19 – adding reference regarding 'addressing any shortfall accrued to date against the target within a five year period'.	Minor rewording of text to clarify intent and therefore no LSE arises.
MO60	Removal of Figure 5.1. Additional text broadly referring to the revised capacity of the SUE at Knowsley Lane.	Minor editing to clarify intent and therefore no LSE arises.
MO63 (PM15)	Policy CS4, clause 2 – Revision of text to clarify that the requirement was a minimum. The original modification reduced the amount of land to be developed for employment at key sites to 164ha between 2010 and 2028.	The original figure of 183.5ha of land to be developed within the key sites between 2010 and 2028 has been previously reduced as part of the original proposed modification. Revised wording clarifies only that the 164 ha requirement is a minimum. The alterations provide no mechanism for LSE to arise.
MO65	Footnote 79 – Deletion.	Minor rewording of footnote text to ensure consistency and therefore no LSE arises.
MO71	Removal of Table 5.1: Employment Land Requirements 2010/2011 – 2027-28 (rounded). Replaced with Table 5.1A: Employment Land Requirements and Land Supply as at 2013.	Amendment to table following clarification of net developable areas. There is no mechanism for LSE to arise.
MO73	Paragraph 5.34 – Removal of reference to 5 year supply. Additional text clarifying monitoring in accordance with Appendix D.	Minor rewording of text to clarify intent and therefore no LSE arises.
Chapter 6		
M157	Paragraph 6.45. Text addition to ensure consistency with policies SUE1 and SUE 2c.	Minor rewording of text to clarify intent and therefore no LSE arises.
New Chapter 6A		
M168	New Chapter 6A - Sustainable Urban Extensions and Safeguarded Land. To address matters identified during the Examination in Public hearings in July 2014. Located within Appendix 2 of this Schedule.	Reworking of policy and text (including a minor revision downwards to employment land in SUE2a) to clarify intent and address matters identified during the Examination in Public hearings in July 2014. These alterations would not present any mechanism for LSE to arise.
	Appendix 2 of Amendments Schedule August 2014 – Sustainable Urban Extensions and Safeguarded Land – Amendments to text: Policy SUE 1, Policy Links SUE 1, 6A.p, 6A.11, Policy SUE 2, Policy Links for SUE 2, 6a.15, 6a.17, 6a.18, 6a.19, Policy SUE 2a, Policy Links for SUE 2a, 6A.22, 6A.24, Policy SUE 2b, Policy Links for SUE 2b, Policy SUE 2c,	

Modification number	Modification	Likely Significant Effect (LSE)?
	Policy Links for SUE 2c, 6A.30, 6A.32, 6A.33.	
Chapter 7		
M176	Paragraph 7.9 – Additional text with reference to the extent of affordable housing.	Minor rewording of text to introduce flexibility in tenure. These alterations would not present any mechanism for LSE to arise.
Chapter 9		
M221A	Policy CS 24, clause 4 – Additional bullet points referring to flood mitigation measures ensuring consistency.	Minor reformatting in the interest of consistency and therefore no LSE arises.
Chapter 10		
M232	Policy CS 27, clause 3 – Additional text referring to the Knowsley Infrastructure Delivery Plan and it being ‘appropriate to the scale and nature of the development’, removal of reference to proposals needing to be “in compliance with” the Infrastructure Delivery Plan.	Minor rewording of policy text to clarify intent and therefore no LSE arises.
M233	Policy CS27, clause 4 – Deletion of reference to ‘Supplementary Planning Documents’.	Deletion of policy text to ensure consistency with the status of Supplementary Planning Documents as a guidance in decision making. The amendment has no pathway of impact upon LSE.
M240	New paragraph 10.10A – Reference about new development having regard for the IDP. Removal of text referring to ‘compliance with the broad principles contained therein’.	Minor amendment to text. The amendment has no pathway of impact upon LSE.
Appendices		
M246A	Appendix A – Code for Sustainable Homes (CSH)	Minor amendments to text to ensure consistency with Government guidance. Amendments relate to CSH. This amendment has no mechanism for LSE.
M251A	Appendix A – Merseyside and Halton Joint Waste Local Plan.	Minor text modifications reflecting the adoption of the Joint Waste Local Plan. This amendment has no mechanism for LSE.
M258A	Appendix A – Strategic Housing Land Availability Assessment (SHLAA)	Correction of typographical error – no LSE.
M271	Appendix D - (Amendments Schedule Appendix 1) – Core Strategy policy Delivery mechanisms. Minor rewording relating to delivery mechanisms.	The amendments relate to policy delivery mechanisms. The amendments ensure consistency with modifications that respond to matters identified during the Examination in Public hearings in July 2014. These amendments have no pathways of impact and LSE.
M272	Appendix E – (Amendments Schedule Appendix 3) – Sustainable Urban Extensions and Safeguard Land – Allocation Profiles. Amendments in the number of dwellings and area of employment land required within each Strategic site.	Knowsley Lane, Huyton: The number of dwellings required has decreased from 101 to 94, and the area of employment land has reduced from 17.5ha to 16ha. This reduction will have no LSE. Edenhurst Avenue, Huyton: the number of dwellings required has increased from 74 to 86. This is a small increase in the number of dwellings. As such there will be no LSE.

Modification number	Modification	Likely Significant Effect (LSE)?
		Minor text alterations with no LSE