

KNOWSLEY LOCAL PLAN: CORE STRATEGY PROPOSED MODIFICATIONS

Sustainability Appraisal Report

September 2014



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SUSTAINABILITY APPRAISAL REPORT

1. INTRODUCTION

- 1.1 In September 2004, the Planning and Compulsory Purchase Act came into effect and introduced the requirement for Knowsley Council to replace its existing land use development plan – the Knowsley Replacement Unitary Development Plan (UDP)¹ – with a Local Development Framework (LDF). Whilst the Localism Act and the recent publication of the National Planning Policy Framework have resulted in a number of significant changes to the planning system, there is a continued requirement for Knowsley Council to produce a local spatial plan to replace its existing UDP. However, due to the aforementioned changes to the planning system, this replacement plan will now be referred to as a Local Plan rather than a LDF.
- 1.2 Knowsley's Local Plan will comprise a series of individual documents that collectively deal with the spatial issues that will affect the people who will live, learn, work and relax in the Borough. The overarching document of the Knowsley Local Plan will be the "Local Plan: Core Strategy".
- 1.3 The Core Strategy will outline the Council's vision for Knowsley up to the year 2028, and will set out the strategic framework to promote, guide and manage future growth and development in the Borough. Accordingly, it will make important choices about how and where new development will take place and establish an appropriate balance between growth, regeneration and environmental protection / improvement.
- 1.4 Sustainable development is the core principle underpinning the planning system and, as a consequence, sustainability will be at the heart of the Local Plan: Core Strategy. In order to ensure that new plans and strategies contribute towards sustainable development, the Planning and Compulsory Purchase Act 2004 requires a Sustainability Appraisal (SA) to be carried out on all new or revised Core Strategies. SA seeks to promote sustainable development through the integration of sustainability considerations into the preparation, adoption and implementation of plans and strategies. It involves the identification and evaluation of the social, environmental and economic impacts of a plan, offers an opportunity to consider ways in which a plan can make an effective contribution to sustainable development and provides a

¹ Knowsley Replacement Unitary Development Plan (Knowsley Council, 2006)

means of avoiding or reducing any adverse effects that the plan might have.

- 1.5 The Knowsley Local Plan: Core Strategy was submitted to the national government on the 19th July 2013. A number of Examination Hearing Sessions in relation to the Local Plan took place in November 2013 and the Inspector appointed to undertake the examination of the Local Plan issued his interim findings in January 2014. These interim findings concluded that the Plan is sound in key respects. However, the interim findings also advised that changes are likely to be required to aspects of the Plan so that it can be progressed towards adoption. In response, the Council proposed a number of modifications to the Plan.
- 1.5 These proposed modifications were subject to SA, considered in detail at the reconvened hearings which took place in July 2014 and will be made available for public consultation between September and November 2014. In light of the evidence given at the reconvened hearings, a number of further modifications to the Local Plan have also been proposed by the Council.
- 1.6 This report considers the implications of the proposed modifications to the Knowsley Local Plan: Core Strategy in relation to the SA of the Plan. It assesses both the initial series of suggested modifications to the Plan and also the further modifications that have been proposed by the Council following the reconvened hearings. The report specifically seeks to ensure that the potential social, environmental and economic effects of the proposed modifications are fully assessed for significant sustainability impacts, and reported on as part of the Plan making process. It therefore considers whether each of the proposed modifications is significant in SA terms and provides an appraisal of the effect of the proposed modifications which are deemed to be 'significant'.
- 1.7 This report supersedes the Sustainability Appraisal Report produced in June 2014 to accompany the initial series of proposed modifications to the Plan. It provides an addendum to the Final Sustainability Appraisal Report submitted alongside the Local Plan: Core Strategy in July 2013 and should be read in conjunction with this report. In assessing the proposed modifications to the Local Plan, this report seeks only to assess whether the proposed modifications and further modifications change the effect the Local Plan has on the SA Objectives, and, as a result, on the sustainability of the Plan as a whole.

2. REQUIREMENT FOR SA / SEA

- 2.1 Under Section 19(5) of the Planning and Compulsory Purchase Act 2004, where a Local Planning Authority is preparing a Local Plan it is mandatory for the plan to be subject to an SA throughout its production, to ensure that it is fully consistent with, and helps to implement, the principles of sustainable development. The SA performs a key role in providing a sound evidence base for the Local Plan and provides a means of demonstrating to decision makers, and the public, that the plan is the most appropriate given reasonable alternatives.
- 2.2 In parallel with this, the European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment” (the Strategic Environmental Assessment or ‘SEA Directive’), which is transposed into United Kingdom law by the Environmental Assessment of Plans and Programmes Regulations 2004 (the ‘SEA Regulations’), introduced a statutory obligation to conduct an environmental assessment of certain plans. The Regulations apply to a range of UK plans and programmes prepared by public bodies, including Knowsley’s Local Plan: Core Strategy which meets the relevant criteria in that:
- It is “prepared by an authority for adoption, through a legislative procedure by Parliament or Government, and is required by legislative, regulatory or administrative provisions” (Article 2(b)); and
 - It concerns “town and country planning or land use... which sets the framework for future development consent of projects” (Article 5.2(a)).
- 2.3 While SA and SEA are distinct processes, many of their requirements overlap. As a consequence, the Government has prepared guidance² which advises that an integrated approach to SA and SEA should be pursued, so that the SA process also meets the requirements of the SEA Directive and Regulations. This involves extending the breadth of (predominantly environmental) issues required to be considered under SEA to cover the full range of aspects (including social and economic) for sustainability.
- 2.4 In accordance with this guidance, this SA Report (along with the report to which it is an addendum) meets the SEA requirements, and acts as the ‘environmental report’ for the purposes of Regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004. Throughout this report, all references to SA must therefore be taken to include the requirements of European Directive 2001/42/EC.

² CLG Plan Making Manual and the Planning Practice Guidance (2014).

- 2.5 The Planning Practice Guidance³ advises that if modifications are proposed to a Local Plan at the examination stage it is for the local planning authority to decide whether the SA report should be amended following the proposed changes to the emerging plan, irrespective of whether the proposed changes are recommended by the Inspector or are the local planning authority's own proposed amendments.
- 2.6 The subsequent sections of this report outline the history of the SA in relation to the Knowsley Local Plan: Core Strategy and then assess whether the proposed modifications to the Plan are significant. The report then provides an appraisal of those modifications which are considered to be significant in SA terms.

³ The Planning Practice Guidance (Knowsley Council, 2014)

3 HISTORY OF THE SUSTAINABILITY APPRAISAL IN RELATION TO THE LOCAL PLAN: CORE STRATEGY

3.1 The purpose of this SA is to promote sustainable development through the integration of sustainability considerations into the preparation, adoption and implementation of Local Plans. SA does not constitute a separate stage in the production of the Knowsley Local Plan: Core Strategy but instead represents an iterative, on-going process that forms an integral part of the plan-making process. The following section sets out the history of the SA in relation to the Local Plan.

Scoping Report

3.2 In May 2009 an SA Scoping Report was produced to define the scope of the SA with regard to the Core Strategy, and to define the important features of the baseline that will inform the plan. The aim was to ensure that the SA was comprehensive and would address all relevant issues and objectives, by enabling input from key stakeholders and consultation bodies at an early stage in the process.

3.3 In particular, the Scoping Report provided an initial assessment of:

- The relationship between the Core Strategy and other relevant plans and programmes;
- The current environmental, social and economic baseline and any trends; and
- The likely key sustainability issues.

3.4 The Report also set out the proposed methodology for the SA, giving details of its level of detail and scope.

3.5 Consultation on the SA Scoping Report took place between May and June 2009. Comments were invited from the consultation bodies required by the SEA Regulations – the Environment Agency, English Heritage and Natural England⁴ – and the SA Scoping Report was subsequently updated to address the comments received.

Issues and Options Report

3.6 The SA of the Core Strategy Issues and Options Report⁵ was consulted upon between November 2009 and January 2010.

3.7 As part of the consultation, the Issues and Options Report presented three distinct Strategic Spatial Options for the development of

⁴ The SEA Regulations require the Environment Agency, English Heritage, Natural England and the Countryside Agency to be consulted on the scope of sustainability appraisals. However, the Natural Environment and Rural Communities (NERC) Act merged the Countryside Agency and English Nature to form a new agency - Natural England.

⁵ Knowsley Core Strategy Issues and Options Report (Knowsley Council, 2009).

Knowsley, together with a range of thematic options. The three Strategic Spatial Options were:

- **Option A – "Urban Concentration"** – this option would focus investment in commercial, economic and housing development, services and infrastructure within Knowsley's existing urban areas with no urban expansion into Green Belt areas.
- **Option B – "Focused Urban Regeneration"** – this option would also focus development primarily into the current urban area. Compared to Option A, it would, however, place greater emphasis on focusing new development into locations which are either within or easily accessible from the Borough's most deprived neighbourhoods, or which require regeneration.
- **Option C – "Sustainable Urban Extensions"** – this option would initially also focus development within the current urban areas. For the later years of the plan period however (unlike Options A and B) it acknowledged that there may be a need to enlarge the urban area into areas currently defined as Green Belt to meet the Borough's development needs.

3.8 Further information about each of these options, including their advantages and disadvantages, is provided in Chapter 6 of the Issues and Options Report.

3.9 The Core Strategy Issues and Options Interim SA Report found that each of the three Strategic Spatial Options had the potential to deliver a range of social, environmental and economic benefits, but also that each would have a range of negative effects.

3.10 Comments were received on the Issues and Options Interim SA Report from Natural England and these were taken into account when undertaking subsequent SA of the emerging Core Strategy. In particular, additional references to the baseline information and specific sensitive receptors were incorporated into the appraisals.

3.11 In addition, to the Issues and Options Interim SA Report produced by Urban Vision, an in-house sustainability appraisal of the thematic policies contained within the Issues and Options report was undertaken by the Council.

Preferred Options Report

3.12 The SA of the Core Strategy Preferred Options⁶ report was consulted upon between June and September 2011.

⁶ Core Strategy Preferred Option (Knowsley Council, 2011)

- 3.13 The Preferred Options report set out a Preferred Spatial Strategy for Knowsley which was a combination of Option B "Focused Urban Regeneration" and (for longer term needs) Option C "Sustainable Urban Extensions". The selection of this Preferred Spatial Strategy was based upon the conclusions of the Issues and Options Interim SA Report, the comments received during the consultation on the Issues and Options Paper and the findings of available evidence, particularly on the capacity of the existing urban area to accommodate Knowsley's development requirements during the entire plan period.
- 3.14 The SA of the preferred Spatial Strategy for Knowsley considered that it would have a largely positive impact on the sustainability objectives. In particular, it was considered that the preferred Spatial Strategy has the potential to have a positive impact on the objectives relating to poverty and social deprivation; improving access to goods, services and amenities; improving health and reducing health inequalities; and improving educational attainment. The emphasis was placed upon re-balancing the housing stock by providing a wide choice of new market sector and affordable housing should ensure that the Spatial Strategy has a positive impact on the objective relating to the provision of good quality housing.
- 3.15 The SA of the Core Strategy Preferred Options also undertook an appraisal of the preferred approach to Principal Regeneration Areas and Thematic Policies. This SA concluded that the preferred options for each of Principal Regeneration Areas would have a positive impact on a range of sustainability objectives, particularly those relating to social issues. Nevertheless, it also identified the potential for each of the preferred options to have an uncertain impact on the objective relating to mitigating climate change. A number of recommendations were made to improve the performance of the Principal Regeneration Areas and Thematic Policies against the SA objectives.
- 3.16 Comments were received on the Preferred Options SA Report from the Environment Agency and they were taken into account when undertaking the SA of the Local Plan: Core Strategy Proposed Submission Document.

Sustainability Appraisal of Green Belt Locations

- 3.17 A separate SA was undertaken of the broad locations in the Green Belt being considered for development by the emerging Knowsley Core Strategy. This included an appraisal of those identified as Tier One and Tier Two "reserve locations" as well as those identified as "safeguarded locations" by the Core Strategy Preferred Options Report. In order to ensure that there has been a suitable appraisal of all reasonable options, this SA also provided an appraisal of those locations that were discounted at the final stage of the draft Knowsley Green Belt Study. A number of alternative locations were also proposed by

landowners/developers during the consultation on the draft Knowsley Green Belt Study and the Core Strategy Preferred Options report. This SA therefore also appraised these alternative locations.

Proposed Submission Document

- 3.18 The SA of the Core Strategy Proposed Submission Document⁷ was consulted upon in Autumn 2012 and was submitted alongside the Local Plan: Core Strategy in July 2013. This report constitutes an addendum to the SA of the proposed submission document and should be read alongside it.
- 3.19 The SA of the Proposed Submission document included an assessment of the Approach to Sustainable Development, Spatial Strategy, Principal Regeneration Area Policies and a suite of Thematic Policies.
- 3.20 The appraisal concluded that the Spatial Strategy for Knowsley is likely to have a largely positive impact on the sustainability objectives. In particular, it is envisaged that the Development Principles (CS2) are likely to have a major positive impact in the long-term on the objectives relating to health; mitigating climate change; and reducing the need to travel. It was concluded that the policies for Housing Supply (CS3), the Economy and Employment (CS4) and Town Centres and Retail (CS6) would have a positive impact on a range of objectives, particularly those that relate to social and economic issues and the appraisal also predicted that the policy for Green Infrastructure (CS8) would have a positive impact on a range of objectives, particularly those relating to landscape character and accessibility; biodiversity; adapting to climate change; and green infrastructure.
- 3.21 The appraisal of the Proposed Submission document did however consider that a number of the policies would have an uncertain or negative impact on some of the objectives. For instance, it concluded that a number of the policies, such as the Spatial Strategy (CS1) and Green Belt (CS5) could have an uncertain impact on a number of environmental objectives in the longer term due to the potential for it to result in the release of a number of sites in the Green Belt.
- 3.22 The appraisal of the policies for each of Principal Regeneration Areas included in the Proposed Submission document concluded that each of these policies would also have a positive impact on a range of sustainability objectives, particularly those relating to social issues. The SA considered that the policies relating to Kirkby town centre (CS10), Knowsley Industrial and Business Parks (CS11), South Prescott (CS13)

⁷ Knowsley Local Plan: Core Strategy Proposed Submission Document(Knowsley Council, 2012)

and Prescot town centre (CS14) would also have a major positive impact on at least one of the economic objectives.

- 3.23 Nevertheless, the appraisal of the Proposed Submission document acknowledged that as each of the policies would result in built development and would therefore lead to some carbon emissions associated with the construction and operation of this development, their impact on the objective relating to mitigating climate change is uncertain. It also considered that there is some uncertainty over the impact of the policy for Knowsley Industrial and Business Parks (CS11) on the objectives relating to air quality and need to travel, particularly as there is limited information available on the amount and nature of the new employment uses that would be delivered. In addition, due to both policies resulting in the provision of B1 office development in an out of centre location, the impact of the policies for Knowsley Industrial and Business Parks (CS11) and South Prescot (CS13) on the objective relating to the vitality and viability of Knowsley's town centres was also deemed to be uncertain.
- 3.24 On the whole, the appraisal of the Proposed Submission document concluded that the Thematic Policies performed well in the SA process. In particular, the policies relating to housing and the accommodation needs of the community (CS 15 – CS18) were considered to all have a positive impact on the objectives relating to poverty and deprivation; health and the provision of good quality housing; the policies relating to Sustainable and Low Carbon development (CS22) and Renewable and Low Carbon Infrastructure (CS23) were considered to have a major positive impact on the objective relating to mitigating climate change; and the policy for Greenspaces and Trees (CS21) was considered to have a major positive impact on the objectives relating to landscapes; biodiversity; adapting to climate change; and green infrastructure.
- 3.25 Further details of how the Sustainability Appraisal process influenced the Core Strategy are presented in the Council's Accounting for Assessments document⁸ Sustainability Appraisal of the Proposed Submission Document⁹.

Proposed Modifications to the Submission Local Plan

- 3.26 The initial Local Plan Examination hearing sessions took place in November 2013. Following these hearing sessions, the Inspector appointed to undertake the examination issued his interim findings in January 2014. In response to these findings, and also to reflect other required amendments, the Council proposed a number of modifications to the Plan. These modifications included a revised approach to the

⁸ Knowsley Local Plan: Core Strategy Accounting for Assessments (Knowsley MBC, 2012)

⁹ Sustainability Appraisal of the Proposed Submission Document (Knowsley Council, October 2012)

release of Sustainable Urban Extensions, a reduction in the employment land target for the plan period, a reduced target level of affordable housing provision on sites in the urban area and the prioritisation of different forms of developer contributions in instances where viability is insufficient to fund all the non-mandatory requirements set out in the Plan.

- 3.27 An assessment of the modifications was undertaken to identify which of these is 'significant' in SA terms and an appraisal was completed of the effect of the proposed modifications which were deemed to be 'significant'. The findings of this process were documented in a SA Report issued in June 2014.
- 3.28 This report supersedes the SA Report produced in June 2014 to accompany the initial series of proposed modifications to the Plan. It provides an assessment of both the initial proposed modifications to the Plan and also the further modifications that have been proposed by the Council following the reconvened hearing sessions that took place in July 2014.

4. METHODOLOGY

- 4.1 This SA Report appraises the proposed modifications¹⁰ that have been made to the Local Plan: Core Strategy that are considered to potentially result in significant effects on sustainability objectives.
- 4.2 Each of the modifications that are proposed to the Plan following the Examination have been assessed by members of the team that undertook the original SA of the Plan in order to consider whether these modifications merit further SA. Appendix A provides a complete schedule of the modifications to the Plan that were proposed following the initial hearing sessions in November 2013 and the receipt of the Inspector's interim findings in January 2014. Appendix B provides a complete schedule of the further modifications to the Plan which have been proposed following the further hearing sessions in July 2014, and further interim findings from the Inspector. Both of these appendices detail which of the proposed modifications are considered to potentially result in significant effects on sustainability objectives and the reasons for these conclusions.
- 4.3 Following the completion of this assessment, an appraisal has been undertaken of each of the modifications that are considered to be 'significant' in SA terms. Amongst the more significant changes to the plan is the inclusion of a revised approach to the release of land from the Green Belt in order to meet Knowsley's development needs. Specifically, the modifications to the Plan seek to allocate a number of Sustainable Urban Extensions (SUEs) that will be released from the Green Belt on adoption of the Plan. Four alternative strategic options in relation to the release of these sites have been considered and each of these options has been subject to SA. An appraisal has also been undertaken of a number of policies that will support the delivery of these SUEs and also of a number of site specific options for each of the individual SUEs and area of safeguarded land, including further modifications proposed following the reconvened hearings.
- 4.4 The appraisal has also considered two alternative sites which have been proposed for release from the Green Belt by the landowners and discussed at the Core Strategy hearings in November 2013 – one of which is a site that has previously been considered during the preparation of the Plan but which has been re-appraised to take account of an amendment to its boundary.
- 4.5 Amongst the modifications to the Plan which have been deemed to be 'significant', and which have therefore been subject to appraisal, is a

¹⁰ Knowsley Local Plan: Core Strategy Schedule of Proposed Modifications to the Submission Document (Knowsley MBC, 2014) and Knowsley Local Plan: Core Strategy Schedule of Further Modifications to the Submission Document (Knowsley MBC, 2014).

number of amendments to Policy CS27: Planning for and Paying for New Infrastructure. Further modifications have also been made to this policy following the reconvened hearings. This appraisal of the revised Policy CS27 has taken into account these further modifications and also an earlier assessment undertaken by the Council¹¹ which considered how a number of different options in relation to the prioritising of particular contributions would impact on the social, economic and environmental objectives.

- 4.6 The SA Framework has been used to undertake the appraisal of these policies, options, alternative sites and other proposed modifications which are considered to have the potential to result in significant effects. This SA Framework, together with details of how it was developed and the methodology for the appraisal are set out in the Local Plan: Core Strategy SA Scoping Report and the SA Report of the Proposed Submission version of the Plan.
- 4.7 This approach to SA was based on the process set out in the Office of the Deputy Prime Minister (ODPM) Guidance Paper “Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents”¹² November 2005 and its successor guidance provided by the CLG Plan Making Manual. It is also consistent with the guidance provided in the Planning Practice Guidance.
- 4.8 The appraisal considered the degree and type of impact, split by short term (0-5 years), medium term (5-10 years), and long-term (10+ years). It also predicted the certainty of impact (in terms of high, medium and low); the scale of impact (which ranged from local to national); the permanence of the impact; any key secondary, cumulative and/or synergistic impacts; and options for mitigation.
- 4.9 When undertaking this appraisal the default level of certainty was considered to be medium. When it was considered that the impact of a policy on a particular objective was uncertain it was attributed a low level of certainty. Where the appraisal considered that a policy could have a negative impact on a sustainability objective it sought to identify potential measures that could help mitigate its impact. Measures were also suggested if it was considered that there were potential ways of enhancing an already positive impact.
- 4.10 The scale of any impact on an objective has been predicted taking into account the size of the site and the quantum of development it is likely to accommodate. In relation to housing sites, where an approximate number of dwellings that could be accommodated on a site have not

¹¹ See Developer Contributions: Technical Report (Knowsley MBC, 2014)

¹² Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (ODPM, November 2005)

been provided by the promoter of the site, its yield has been estimated based on the standard multipliers used for assessing the capacity of sites within the Strategic Housing Land Availability Assessment (SHLAA) and the Green Belt Study. For sites in excess of 2 hectares in site size, this assumed a 75% net developable area and a density of 30 dwellings per hectare¹³.

- 4.11 Further details on the proposed modifications and options that have been appraised, and a summary of the outcomes of this appraisal, is provided in the following sections of this report.

¹³ See Table 3.9 (Net Developable Areas) of Housing Position Statement (Knowsley MBC, 2013)

5. APPRAISAL OF THE PROPOSED MODIFICATIONS TO THE LOCAL PLAN: CORE STRATEGY

5.1 This chapter provides a summary of the outcomes of the appraisal of the proposed modifications to the Local Plan: Core Strategy. The detailed appraisals of these modifications are provided in the appendices to this report.

Schedule of Modifications

5.2 Following the submission of the Local Plan: Core Strategy for examination and the public hearings which took place in November 2013, the Council has identified a series of potential modifications to the Plan. These potential modifications are detailed in a Schedule of Modifications which includes:

- Potential modifications which were identified in the Council's statements for the hearing sessions (issued October 2013); and
- Further potential modifications and/or revisions to modifications already identified resulting from the discussions at the hearing sessions

5.3 These proposed modifications were considered in detail at the reconvened hearings which took place in July 2014. In light of the evidence given at these hearings, and further interim findings issued by the Inspector, a number of further modifications to the Local Plan have been proposed by the Council. These potential additional modifications are detailed in a Schedule of Further Modifications.

5.4 Within both of these schedules, modifications are either classified as "main" or "additional" modifications. "**Main modifications**" are those which may be required to ensure that the Plan is "sound" and legally compliant. "**Additional modifications**" are of a more minor nature and mainly relate to points where a need has been identified to clarify the text, include updated facts, or make typographical or grammatical revisions which improve the readability of the Plan.

5.5 Each of the proposed modifications have been analysed as part of the SA process in order to determine which, if any, of these are 'significant' in SA terms.

5.6 This exercise identified that in the majority of instances, the proposed modifications would not significantly alter the intent of the Plan. Accordingly, it is concluded that many of the proposed modifications are unlikely to have a significant material impact on the performance of the Plan in the SA process and do not therefore merit further appraisal. Nevertheless, this exercise did identify several instances where

proposed modifications have the potential to be 'significant' in SA terms.

- 5.7 Appendix A provides a complete schedule of the proposed modifications to the Plan and details which of these are considered to potentially result in significant effects on sustainability objectives and the reasons for these conclusions. The same exercise for the proposed further modifications is provided in Appendix B. A summary of the appraisal of the effects of the proposed modifications which are deemed to be 'significant' is presented in the following section of this report.

Green Belt Allocations Strategic Options Appraisal

- 5.8 A number of evidence base documents prepared to support the preparation of the Local Plan: Core Strategy have demonstrated that there are insufficient deliverable sites within the urban area of Knowsley to meet the borough's development needs. In particular, the Strategic Housing Land Availability Assessment (SHLAA)¹⁴ and the Joint Employment Land and Premises Study (JELPS)¹⁵ have highlighted that there is not enough suitable land for housing and employment development within the existing urban areas of Knowsley to meet development requirements until 2028. The Liverpool City Region Housing and Economic Development Evidence Base Overview Study¹⁶ has also assessed the housing and employment evidence collated by individual districts within the Liverpool City Region in order to determine whether each district has sufficient land to meet housing and employment growth requirements in the longer term. This study concluded that there is a potential undersupply of housing land in Knowsley and that there are also potential shortfalls in employment land in the medium/long term.
- 5.9 Taking account the findings of these evidence base studies, and also the nature of the linkages in housing markets and travel to work areas, and the need to ensure that there is an appropriate supply of sites throughout the Plan period, the Council decided to identify a number of broad locations which would be removed from the Green Belt boundaries through the Local Plan process in order to support longer term housing and employment growth.
- 5.10 A series of potential locations for release from the Green Belt were considered for release. These included locations recommended for consideration by the Knowsley and Sefton Green Belt Study –

¹⁴ Knowsley Housing Position Statement (Knowsley MBC, 2013)

¹⁵ Joint Employment Land and Premises Study (BE Group, 2010)

¹⁶ Liverpool City Region Housing and Employment Development Evidence Base Overview Study (GVA Grimley, 2011)

Knowsley Report¹⁷ and alternative locations put forward for consideration by landowners and/or developers. Following the assessment and SA of these locations a series of 'reserved' and 'safeguarded' locations were identified and included in the Local Plan: Core Strategy Submission document.

- 5.11 Under the policies within the Submission version of the Core Strategy, the release of these 'reserved' and 'safeguarded' locations was subject to phasing restrictions. However, following the close of initial hearing sessions undertaken as part of the examination of the Local Plan: Core Strategy, the Inspector appointed by the Secretary of State to undertake the examination of the Plan issued his interim findings which highlighted the need to consider whether these phasing restrictions should be removed to ensure that there is an adequate supply of housing and employment land during the plan period.
- 5.12 Consequently, as part of the proposed modifications to the Local Plan: Core Strategy, the Council devised four strategic options in relation to these Green Belt allocations. These were:
- Option 1 – Convert all of the 'reserved' locations to Sustainable Urban Extension (SUE) site allocations allowing development early in the Plan period.
 - Option 2a – Convert the largest 'reserve' locations (South of Whiston, Land South of M62 and East of Halewood) to SUE site allocations allowing development early in the Plan period. Remaining locations to be identified as 'broad locations' in the Green Belt and released subject to phasing mechanisms.
 - Option 2b – Convert the smaller 'reserve' locations to SUE site allocations allowing development early in the Plan period. Remaining locations (South of Whiston, Land South of M62 and East of Halewood) to be identified as 'broad locations' in the Green Belt and released subject to phasing mechanisms.
 - Option 3 – Retain all 'reserve' locations as 'reserve' locations but remove the phasing mechanism in the Plan. This would not involve identifying site boundaries on the Policies Map and would not include detailed policies to guide development of the sites.
- 5.13 Each of these Strategic Options has been appraised through the SA process. A summary of the outcomes of the appraisal of these Strategic Options is provided below and the full appraisal of these options is presented in Appendix C.
- 5.14 The appraisal of the Strategic Options for the allocation of Green Belt sites concluded that each of the options would have a similar impact on the majority of the sustainability objectives. Nevertheless, it identified

¹⁷ Knowsley and Sefton Green Belt Study – Knowsley Report (Knowsley MBC, 2012)

several instances where the choice of option would affect the likelihood of these impacts taking place and the timeframe over which the impact would occur.

- 5.15 The appraisal identified that each of the options has the potential to have a positive impact on a wide range of sustainability objectives. All four of the options would provide support for the release of land from the Green Belt, as Sustainable Urban Extensions (SUEs), to ensure that there is sufficient land to meet the development needs of the Borough. Consequently, each of the options would provide a mechanism to support the delivery of new housing and employment development and could therefore help support the re-balancing of the housing market; help to support existing, and attract new businesses; and support the creation of employment opportunities. In addition, as economic viability evidence indicates that many of these locations are likely to be among the most viable in the Borough, each of the options could also contribute towards affordable housing provision. As such, the appraisal considered that all four of the options have the potential to have a major positive impact on the objectives that relate to providing good quality housing; improving the competitiveness of business and increasing the number of new businesses; and reducing unemployment. The appraisal also concluded that the impact on each of these objectives would become increasingly significant as the SUEs are built out.
- 5.16 The appraisal of the Strategic Options did however consider that there is a greater level of certainty that Option 1 would have a positive impact on these objectives, particularly in the earlier part of the plan period, as this option would provide greater scope for housing and employment delivery in the short term. By contrast, Option 2a would prioritise the delivery of a more limited number of sites. Whilst each of these sites could accommodate a significant quantum of development, there is a risk that this option could make a more limited contribution to the objectives if the delivery of any of these sites were delayed. In comparison to Option 2a, Option 2b would support the early release of a greater number of SUEs. However, many of the sites that would be prioritised are smaller in scale and, as a result, this option is unlikely to have a major positive effect on these objectives until later in the plan period when the larger SUEs start to come forward. Option 3 would not prioritise the early release of any sites in the Green Belt and could also result in planning applications for housing or employment development which the Council may be minded to approve being 'called in' by the Secretary of State due to these locations remaining in the Green Belt. As a result, the appraisal considered that it is uncertain whether this option would have any significant impact on these objectives in the short term. It could however still have positive impacts over the longer term if the sites in the Green Belt do start to come forward but there is

a low level of certainty about this as the option would not provide certainty for the development industry.

- 5.17 By supporting job creation and the provision of high quality housing, the appraisal noted that each of the options could also have a major positive impact on the objective that relates to poverty and deprivation. However, as Option 1 could result in the early development of SUEs, the appraisal recognised that there is the potential for this option to result in a slight oversupply of housing sites in the short term which could lead to competition with, and risk the delivery of, housing-led regeneration schemes elsewhere in the Borough. As such, the appraisal concluded that the impact of this option on the objective is uncertain in the short term. Option 3 would also have an uncertain impact on the objective in the short term as it would not prioritise the early release of any sites in the Green Belt. By contrast, Options 2a and 2b would prioritise the delivery of some sites earlier in the Plan period but this would be a more limited number of sites than under Option 1 which would reduce the likelihood of there being competition with regeneration schemes elsewhere in the Borough. As such, the appraisal concluded that both Option 2a and 2b have the potential to have a positive impact on the objective in the short term. However, there is only a low level of certainty about the impact of these options on the objective, particularly in the earlier part of the plan period.
- 5.18 By resulting in development taking place in locations that are generally well-related to existing facilities and services and which are served by existing public transport, each of the options could also have a positive impact on the objectives that relate to improving access to goods and services; and reducing the need to travel and improving the choice and use of more sustainable transport modes. Each of the options could also result in developments which generate a range of training opportunities and could generate additional expenditure in the Borough's town and local centres. As a result, the appraisal considered that each option has the potential to have a positive impact on the objectives that relate to education and training; and the vitality and viability of Knowsley's town and local centres. However, in each of these instances, the appraisal noted that Option 3 would have an uncertain impact on these objectives in the short term due to the fact that it may not provide the certainty for the development industry required to guarantee the necessary investment to bring such sites forward for development. There is also considered to be a greater level of certainty that Option 1 would have a positive impact on the objectives that relate to education and training; and the vitality and viability of Knowsley's town and local centres, particularly in the earlier part of the plan period, as each of the other options could result in longer lead-in times for sites coming forward and/or slower than anticipated delivery on allocated SUEs.



- 5.19 The appraisal did however note that each of the options would have the potential to have a negative impact on a number of objectives. Although some of the locations that would be released from the Green Belt contain areas that have been previously developed, each of the options would support the release of large areas of greenfield land which contain a number of landscape features and which has the potential to form part of the Green Infrastructure network. In addition, a number of the SUEs contain areas of priority habitat and others contain Local Wildlife Sites or are adjacent to them. As such, the appraisal concluded that each of the options has the potential to have a negative impact on the objectives that relate landscape character; biodiversity; green infrastructure; and protecting land and soil. However, as Option 3 would not prioritise the early release of any sites in the Green Belt, the appraisal considered that it is uncertain whether this option would have any significant impact on these objectives in the short term as it may not provide the certainty for the development industry required to guarantee the necessary investment to bring such sites forward for development. It would however still have negative impacts on these objectives in the longer term as the sites in the Green Belt do start to come forward. The other objectives that each option has the potential to have a negative impact on are those which relate to protecting air quality; and improving health.
- 5.20 The appraisal also identified instances where each of the options would have an uncertain impact on a number of objectives. In particular, as a number of the SUEs contain archaeological assets and others contain, or are adjacent to, designated heritage assets, the appraisal recognised that each of the options could result in development which affects the setting of both designated and non-designated heritage assets. However, as there may be instances where the development that takes place in these locations could stimulate investment that supports the protection and maintenance of these assets, the appraisal concluded that each of the options would have an uncertain impact on the objective that relates to Knowsley's built heritage. Each of the options would also have an uncertain impact on the objective that relates to mitigating climate change as although the construction and operation of development at the SUEs would inevitably result in some carbon emissions other policies in the Core Strategy are likely to ensure that all new development is designed in a way to maximise energy efficiency and the majority of the SUEs are well-related to existing facilities and services and are served by existing public transport and several are of also a scale where they could facilitate improvements to public transport provision.

Sustainable Urban Extension Policies Appraisal

- 5.21 In order to support the delivery of the Sustainable Urban Extensions (SUEs) and to provide additional guidance on the approach to

safeguarded land, the proposed modifications to the Local Plan include five new policies that relate to these sites. Two of these policies provide overarching guidance that is applicable to each of the SUEs. The remaining three policies relate specifically to individual SUEs.

- 5.22 As these policies were not included in the Core Strategy Proposed Submission Document, they had not previously been subject to appraisal through the SA process. Accordingly, a separate appraisal of each of these policies was undertaken in June 2014. A number of further modifications to these policies have been proposed following the reconvened hearings in July 2014. The appraisal of these policies has therefore been updated to take these further modifications into account. A summary of the outcomes of these appraisals is provided below and the full appraisal of these policies is presented in Appendix D.

SUE1 - Sustainable Urban Extensions and Safeguarded Land

- 5.23 The policy on Sustainable Urban Extensions (SUEs) and Safeguarded Land has the potential to have a positive impact on a number of the sustainability objectives and the proposed further modifications would not have a significant impact on the performance of the policy in the SA process.
- 5.24 The Joint Employment Land and Premises Study (2010) concludes that there is insufficient suitable land for employment development within the existing urban area of Knowsley to meet the Borough's development requirements. The identification of a number of sites for release from the Green Belt provides an additional mechanism to ensure that there is sufficient land to meet the employment land needs of the Borough. The policy should therefore have a positive impact on the objectives that relate to poverty and economic inclusion; business growth and productivity; and reducing unemployment. Similarly, the Knowsley Strategic Housing Land Availability Assessment concludes that there is insufficient suitable land for housing within the existing urban area of Knowsley to meet the Borough's housing requirements. As a result, by providing a mechanism to ensure that there is sufficient housing land to meet the housing needs of the Borough, the policy has the potential to have a positive effect on the objective that relates to the provision of good quality housing.
- 5.25 Although the policy would still safeguard land at Knowsley Village to ensure there is sufficient housing land supply in the longer term, the proposed further modifications mean that there is no longer a trigger mechanism which would allow housing development to come forward on this site before 2028. However, the policy would still support housing development on a number of Sustainable Urban Extensions before 2028 and would not preclude development of the land at Knowsley Village post 2028. As, such, the proposed modification would not have a significant impact upon the scoring and the policy would still

have a positive effect on the objective that relates to the provision of good quality housing. Many of the SUEs that are identified by the policy are located in relatively close proximity to existing town and local centres. Consequently, by directing development to these SUEs the policy could generate additional expenditure in these centres and therefore have a positive impact on the objective that relates to enhancing the vitality and viability of town and local centres.

- 5.26 The revised policy does however still have the potential to have a negative or uncertain impact on a range of objectives, particularly those that relate to environmental issues. Specifically, the policy would result in the development of a significant area of greenfield land and would therefore have a negative impact on the objective of protecting land and soil quality and its sub-objective of directing new housing to previously developed land. The development of the SUEs could also place additional pressure on Local Wildlife Sites and may also result in the loss of priority habitat. It is therefore considered that the policy has the potential to have some negative impact on the objective that relates to biodiversity. Nevertheless, in the absence of detailed ecology studies for the majority of the SUEs it is considered that there is only a low level of certainty about the impact of the policy on this objective.
- 5.27 The amended policy would also still have an uncertain impact on the objective that relates to landscape character as although it would result in the development of land in the Green Belt, it is recognised that not releasing this land may result in additional development pressure being placed upon greenfield sites within the urban area which would have a negative impact on the sub-objectives relating to providing the required amount of open space and providing open space in accessible locations. Similarly, although the development of the SUEs would result in the loss of significant areas of greenfield land that could function as part of the green infrastructure network, not releasing these sites may result in additional development pressure being placed upon greenfield sites within the urban area. Consequently, the impact of the policy on the objective relating to green infrastructure is also uncertain. The policy would also have an uncertain impact on the objective that relates to health as although it could lead to the loss of some land that is used for informal recreation; areas that are used for outdoor sports provision would be protected.
- 5.28 In addition, although a number of the SUEs are in close proximity to heritage assets, it is difficult to forecast whether development in these locations would adversely affect the setting of these assets or stimulate investment that supports their protection and maintenance. Accordingly, the impact of the policy on the objective of preserving and enhancing Knowsley's built heritage is uncertain. Whilst the development of the SUEs could generate a significant amount of traffic and associated emissions, it is noted that many of the sites identified

for release from the Green Belt are well-related to existing facilities and public transport services. In particular, the Knowsley Local Plan Transport Feasibility Assessment (2012) identified that some of these locations have good accessibility to bus routes, cycle routes and services and facilities, such as major food stores and secondary schools. Consequently, it is considered that the impact of the policy on the objectives which relate to mitigating climate change; protecting air quality; and sustainable transport is also uncertain.

Policy SUE 2 – Sustainable Urban Extensions Development Principles

- 5.29 The policy has the potential to have a positive impact on a wide range of sustainability objectives and the proposed further modifications would not have a significant impact on its performance in the SA process. The policy specifies that development in the Sustainable Urban Extensions will be required to meet local and borough-wide needs, which will include the need for good quality housing. As such, the policy has the potential to have a positive impact on the objective that relates to the provision of good quality, affordable and resource efficient housing. By specifying that development in the Sustainable Urban Extensions must be of a design quality that enhances local distinctiveness and identity and which protects or enhances historic and architectural assets where appropriate, the policy should also have some positive impact on the objective of preserving and enhancing Knowsley's built heritage.
- 5.30 The policy requires development in Sustainable Urban Extensions to provide public open space as part of the Green Infrastructure network. As a result, the policy has the potential to support the provision of green infrastructure and would have a positive impact on the objective of providing and conserving green infrastructure. The provision of this green infrastructure could also have a positive effect on water quality by helping to control rates of surface water run-off. As such, it is considered that the policy would also have a positive effect on the objective that relates to the protection and improvement of water quality.
- 5.31 The policy specifies that development in Sustainable Urban Extensions will be required to comply with the development principles contained in Policy CS2. This will ensure that development which takes place in these locations will be required to, amongst other things, protect and enhance environmental assets, respect the character and distinctiveness of landscapes, maintain or enhance the quantity and quality of biodiversity and habitats, protect soil quality, make the most efficient use of available resources, and promote sustainable economic development. As such, it is considered that the policy has the potential to have a positive impact on the objectives that relate to landscape character; biodiversity; land and soil quality; the prudent use of water

and mineral resources; minimising the production of waste; and improving the competitiveness of businesses.

- 5.32 Requiring development in Sustainable Urban Extensions to be carried out in accordance with Policy CS2 would also require development in these locations to reduce the need to travel; achieve a shift towards more sustainable modes of transport; and promote the use of public transport, walking and cycling. As a result, the policy could have a positive impact on the objectives that relate to mitigating climate change; protecting air quality; and the use of sustainable transport modes. The policy also requires development in these locations to provide good transport linkages but it does not specify whether this is by public transport or private vehicles. This reduces the level of certainty that the policy would have a positive impact on each of these objectives. It is however recognised that other policies in the Plan would require development in these locations to deliver enhanced transport provision, incorporating public transport, walking and cycling. As such, no mitigation measures are proposed.
- 5.33 The policy requires development in the Sustainable Urban Extensions to demonstrate a comprehensive approach to infrastructure provision and provide good transport linkages. This should ensure that the future occupants of development in these locations have good access to services, facilities and employment opportunities. As a result, it is considered that the policy has the potential to have a positive impact on the objectives that relate to poverty and economic inclusion; the accessibility of goods, services and amenities; health; the vitality and viability of town and local centres; and maintaining high and stable levels of employment.
- SUE 2a – Sustainable Urban Extension: Knowsley Lane, Huyton*
- 5.34 The policy has the potential to result in positive impacts on a wide range of social, environmental and economic objectives and the proposed further modifications would not have a significant impact on the performance of the policy in the SA process. In particular, although the proposed further modifications to the Plan may reduce the amount of employment development at the site from 17.5 hectares to 16 hectares, the policy still directs a significant amount of employment development to this location and specifies that this is a minimum provision. The revised policy would therefore continue to support the provision of a wide range of high quality employment premises that would provide accommodation for new businesses, stimulate investment in the area and provide a range of employment and training opportunities. Accordingly, the policy still has the potential to have a major positive impact on the objectives that relate to business growth and productivity; and reducing unemployment; and some positive effect on the objectives concerned with poverty and deprivation; and education and skills.

- 5.35 Although the further modifications to the policy would remove the specific reference to residential development in this location meeting local needs, the revised policy would still support the delivery of the same scale of housing and would still require development in this area to provide a wider choice of housing in the area. The revised policy would therefore still have a positive impact on the objective of providing good quality housing. The site is in close proximity of a number of local facilities, including Longview Community primary school which borders the site to the south, a GP and health centre within 500m of the site and a leisure centre 700m to the south of the site. The majority of the site is also within 200m of Knowsley Lane which provides a regular bus service to destinations including Rainhill, Huyton Industrial Estate and St Helens. The policy would therefore lead to the provision of housing in a location which would provide the future occupants of the site with easy access to existing services and facilities by a choice of means of transport. As such, it is considered that the policy could have a positive impact on the objectives that relate to improving access to services and amenities. The policy could also have a positive impact on the objective that relates to health as it would provide protection for the public open space on the site and would therefore ensure that there are opportunities to participate in sport and recreation. The policy also specifies that development in this location would need to provide flood storage and mitigation measures to address flood risk. This should ensure that the policy would also have some positive impact on the objective of adapting to climate change.
- 5.36 The policy would however have the potential to have a negative impact on a number of objectives. In particular, the policy directs development to a greenfield site that contains large areas of Grade 3 Best and Most Versatile agricultural land. Consequently, although the policy would require the provision of public open space, it would still result in the loss of a significant area of greenfield land and would therefore have a major negative impact on the objective that relates to protecting land and soil and its sub-objective of directing new housing to previously developed land. The policy would also have a negative impact on the objective that relates to green infrastructure as it would lead to the loss of a significant area of greenfield land which has the potential to function as part of the Borough's green infrastructure network, although it is acknowledged that areas of public open space would be protected by the policy and the preparation of a Supplementary Planning Document to guide development in this location should ensure the appropriate retention and provision of areas of some Green Infrastructure.
- 5.37 Directing development to this location would also have a negative impact on the objective that relates to protecting landscape character; and could have a negative impact on the objective that relates to

biodiversity by resulting in the loss of priority habitat. Nevertheless, in the absence of detailed ecological surveys, and due to the fact that the policy would protect areas of public open space on the site, there is only a low level of certainty about the impact of the policy on the objective that relates to biodiversity.

5.38 Although the policy would result in development taking place in a location that is served by public transport and within convenient walking distance of a number of facilities, the construction and operation of this development would inevitably result in some carbon emissions and, due to the scale of the development that would take place, it would also inevitably generate a significant number of vehicular trips and associated emissions. Consequently, it is considered that the policy has the potential to have some negative impact on the objectives that relate to mitigating climate change; and protecting air quality.

5.39 The policy would also have an uncertain impact on a number of objectives. Specifically, although the policy refers to delivering appropriate highways improvements, it makes no reference to improving access to the site by public transport, walking and cycling. Consequently, it is considered that the policy would have an uncertain impact on the objective that relates to the choice and use of sustainable modes of transport. The policy would also have an uncertain impact on the objective that relates to Knowsley's as although development in this location could impact on the setting of designated heritage assets, the policy does seek to ensure that the development protects and enhances historic and architectural assets.

SUE 2b – Sustainable Urban Extension: East of Halewood

5.40 The policy has the potential to result in positive impacts on a wide range of social, environmental and economic objectives and the proposed further modifications would not have a significant impact on the performance of the policy in the SA process. In particular, although the further modifications to the policy would remove the specific reference to housing in this location meeting local needs, the revised policy would still support the delivery of the same scale of housing and would still require the development to provide a wider choice of housing in the area. Consequently, given the substantial capacity of the site, it is considered that the amended policy still has the potential to have a positive impact on the objective of providing good quality housing and this impact would become increasingly significant as the development is built out. Due to the quantum of development that would be delivered on the site, the policy could also encourage further investment in the area, generate employment and training opportunities in the construction sector, sustain existing local employment and also potentially bring new jobs into the area. As such, the policy could also have a positive impact on the objectives that relate to poverty and deprivation; education and skills; business growth and productivity; and

reducing unemployment. It could also generate additional expenditure in nearby town and local centres and, as such, could have some positive impact on the objective of enhancing the vitality and viability of town and local centres.

- 5.41 The policy would also result in residential development taking place in a location that is within reasonably close proximity of an established employment area and a number of local facilities, including a local shopping centre on Bailey's Lane, primary schools, a leisure centre 30m to the west of the site and a GP and health centre within 200m of the site. The policy also requires new development in this location to contribute towards transport provision, including public transport, walking and cycling. As such, it is considered that the policy could have a positive impact on the objectives that relate to improving access to services and amenities; and improving the use of more sustainable transport modes. The policy also specifies that development in this location would need to provide flood storage and mitigation measures to address flood risk. This should ensure that the policy would also have some positive impact on the objective of adapting to climate change.
- 5.42 The policy would however have the potential to have a negative impact on a number of objectives. In particular, the policy directs development to a greenfield site that largely comprises of Grade 2 or Grade 3 Best and Most Versatile agricultural land. As such, the policy would have a major negative impact on the objective that relates to protecting land and soil and its sub-objective of directing new housing to previously developed land. By directing development to this location the policy would also extend the urban edge of Halewood and result in the loss of a substantial area of greenfield land that has the potential to function as part of the Borough's Green Infrastructure network. As such, the policy would also have a negative impact on the objectives that relate to protecting landscape character; and conserving green infrastructure, although it is acknowledged that the preparation of a Supplementary Planning Document to guide development in this location should ensure the appropriate retention and provision of areas of Green Infrastructure.
- 5.43 The policy would result in development taking place in a location that is within reasonably close proximity to a number of local facilities and would also require development in this location to contribute towards transport provision, including public transport, walking and cycling. However, the construction and operation of this development would inevitably result in some carbon emissions and, due to the scale of the development that would take place, it would also inevitably generate a significant number of vehicular trips and associated emissions. Consequently, it is considered that the policy has the potential to have some negative impact on the objectives that relate to mitigating climate



change; and protecting air quality. The policy would also direct development to a location that contains priority habitat and which adjoins a Local Wildlife Site. It is therefore considered that the policy has the potential to have a negative impact on the objective that relates to biodiversity and would have an uncertain effect on the policy concerned with water quality. Nevertheless, in the absence of detailed surveys there is only a low level of certainty about the impact of the policy on each of these objectives.

SUE 2c – Sustainable Urban Extension: South of Whiston and Land South of M62

- 5.44 The policy has the potential to result in positive impacts on a wide range of social, environmental and economic objectives and the proposed further modifications would not have a significant impact on the performance of the policy in the SA process. In particular, although the further modifications to the policy would remove the specific reference to housing in this location meeting local needs, the revised policy would still support the delivery of the same scale of housing and would still require the development to provide a wider choice of housing in the area. Consequently, given the substantial capacity of the site, it is considered that the policy has the potential to have a positive impact on the objective of providing good quality housing and this impact would become increasingly significant as the development is built out. The policy also promotes a significant amount of employment development in this location and, due to the scale of development that would be delivered, could also encourage further investment in the area, generate employment and training opportunities in the construction sector and help sustain existing local facilities. As such, the policy could also have a major positive impact on the objectives that relate to business growth and productivity; and reducing unemployment; and some positive effect on the objectives concerned with poverty and deprivation; and education and skills.
- 5.45 The policy would also result in residential development being directed to a location that is within reasonably close proximity of established employment areas and a number of local facilities, including primary schools, a GP and health centre and a local shopping centre on Greenes Road. It also requires new development in this location to contribute towards public transport provision and improve links to Whiston railway station. As such, the policy could have a positive impact on the objectives that relate to improving access to services and amenities; and the use of more sustainable transport modes.
- 5.46 Given the scale of development promoted, the policy has the potential to generate a significant amount of additional expenditure which could support nearby local centres. As such, the policy has the potential to have a positive impact on the objective that relates to the vitality and viability of town and local centres. In addition, a key element of the

proposals for the site is the creation of a country park with associated footpaths, cycleways and bridleways, and the policy also requires development in this location to encourage walking and cycling and provide public open space. As such, it is considered that the policy could support participation in sport and recreation and could therefore have a positive impact on the objective that relates to health.

- 5.47 The policy would however have the potential to have a negative impact on a number of objectives. In particular, it directs development to a greenfield site that contains large areas of Grade 2 Best and Most Versatile agricultural land. As such, the policy would have a major negative impact on the objective that relates to protecting land and soil. Directing development to this location would also have a negative impact on the objective that relates to protecting landscape character; and could have a negative impact on the objective that relates to biodiversity by resulting in the loss of priority habitat and/or by placing pressure on nearby Local Wildlife Sites. Nevertheless, there is only a low level of certainty about the impact of the policy on this objective.
- 5.48 The policy will result in development taking place in a location that is within reasonably close proximity to local facilities and would also require the development to contribute towards public transport, walking and cycling. However, the construction and operation of this development would inevitably result in carbon emissions and would inevitably generate a significant number of vehicular trips and associated emissions. Consequently, the policy has the potential to have some negative impact on the objectives that relate to mitigating climate change; and protecting air quality.
- 5.49 The policy would also have an uncertain impact on some of the sustainability objectives. Specifically, the policy would result in development being directed to a location that is in close proximity to a number of heritage assets. Nevertheless, due to the scale of the site, there may be scope to incorporate an adequate buffer around these assets to protect their setting. In addition, the policy requires development in this location to comply with Policy SUE 2 which, amongst other things, requires new development to protect and enhance historic and architectural assets. As such, it is uncertain whether the policy would have a significant impact on the objective that relates to preserving and enhancing Knowsley's built heritage.
- 5.50 Although the policy directs development to a greenfield site which has the potential to function as part of the Borough's Green Infrastructure network, it also involves the creation of a country park and the requirement for development in this location to be subject to a master planning should ensure the appropriate retention and provision of areas of Green Infrastructure. As such, the impact of the policy on the

objective that relates to providing and conserving green infrastructure is also considered to be uncertain.

- 5.51 Similarly, although the policy would result in development taking place in the vicinity of a number of water bodies, there is limited certainty over whether this would impact on the water quality of these waterbodies. Consequently, it is considered that the policy would also have an uncertain impact on the objective of protecting, improving and where necessary, restoring the quality of inland, and estuarine waters.

Sustainable Urban Extension Options Appraisal

- 5.52 In order to ensure that due consideration is given to alternative options for the delivery of Sustainable Urban Extensions, the Council has developed a range of site specific options in relation to each of these sites. These options have not previously been subject to appraisal through the SA process. Accordingly, a separate appraisal of the options for each of these sites has been undertaken. A summary of the outcomes of these appraisals is provided below and the full appraisal of these options is presented in Appendix E. Appendix H provides a matrix that compares the performance of each of the options for the individual SUEs.

KGBS 1 - Bank Lane, Kirkby

- 5.53 Policy SUE1 identifies Bank Lane, Kirkby, as a SUE which will be primarily for residential development. As part of the appraisal of this site, two potential options were considered. The first was to allocate the site for housing development with no phasing restrictions. The second option considered was to allocate the site for housing development but with phasing restrictions.
- 5.54 The appraisal of these options concluded that both of the options would have a positive impact on a wide range of objectives. The location is within reasonably close proximity of both Kirkby town centre and a local centre on Loweswater Way. Both options could increase expenditure in these centres and thereby have a positive impact on the objective of enhancing the vitality and viability of town and local centres. By resulting in the provision of housing in a location that is relatively well served by public transport and within convenient walking distance of a number of community facilities, the appraisal also considered that both options could have some positive impact on the objectives relating to the accessibility of goods and services; and reducing the need to travel.
- 5.55 The location is well-related to areas of deprivation and the appraisal envisaged that the investment in the area, together with the jobs created during the construction of the development, could result in some positive impact on; and reducing unemployment. In addition, the appraisal concluded that both options would offer the opportunity to

have some positive impact on the objectives relating to the provision of green infrastructure; and protecting land and soil.

- 5.56 Both options could make a contribution to the housing needs identified in the Strategic Housing Market Assessment (2010) and have a positive impact on the objective of providing good quality housing. However, the appraisal concluded that Option 2 would have an uncertain impact on this objective in the short term as it could restrict the use of the site for housing in the early part of the plan period. Similarly, although the appraisal considered that both options could have a positive impact on the objective that relates to the local character and accessibility of the landscape, it concluded that the impact of Option 2 on this objective would also be uncertain in the short term as it could potentially prevent the Council from maintaining a five-year land supply and would therefore increase the likelihood of other, potentially less appropriate, sites coming forward through the planning process in the short term. Option 1 would have an uncertain impact on the objective of reducing poverty and social deprivation as it could result in development coming forward in the short term when it is more likely to compete with, and risk the delivery of, housing-led regeneration at Tower Hill Priority Regeneration Area.
- 5.57 The appraisal noted that both options could have a negative impact on some objectives. In particular, the possible impact on the Simonswood Brook Local Wildlife Site (LWS) that bounds the site and the possible loss of priority habitats means that both options could have a negative impact on the objective relating to biodiversity unless appropriate mitigation measures are implemented. However, given that the LWS and area of woodland occupy the northern fringe of the site and may be unlikely to be developed due to its topography and issues in relation to flood risk, it may be possible to mitigate any adverse impact on these features through undertaking ecological surveys, protecting areas of woodland and creating an appropriate buffer around the LWS.
- 5.58 Similarly, without appropriate mitigation the appraisal considered that both options could have a negative impact on the objective relating to adapting to climate change due largely to the northern part of the site being within Flood Zones 2 and 3 as identified by the Council's SFRA. Key mitigation measures to reduce the level of adverse impact on this objective is likely to include applying appropriate measures to mitigate flood risk such as the use of SuDS, the application of the sequential and exceptions tests and, if necessary, excluding the northern part of the site from the developable area.
- 5.59 The appraisal concluded that neither option would have a negative impact on any of the other objectives. The impact of both options on the objective relating to mitigating climate change was however considered to be uncertain.

KGBS 16 - Edenhurst Avenue, Huyton

- 5.60 Policy SUE1 identifies Edenhurst Avenue, Huyton, as a SUE which will be primarily for residential development. As part of the appraisal of this site, two potential options were considered. The first was to allocate the site for housing development with the removal of land covered by Flood Zones 2 and 3 areas from Green Belt. The second option considered was to allocate the site for housing development with the extent of Flood Zones 2 and 3 retained within the Green Belt.
- 5.61 The appraisal concluded that both options would have a relatively mixed impact on the sustainability objectives. Both options could deliver a range of housing types and tenures and could thereby contribute to housing needs identified in the Strategic Housing Market Assessment (2010) and have a positive impact on the objective of providing good quality housing and its sub-objective of providing a wider choice of accommodation to create a greater tenure mix. Both options would also lead to the provision of housing in a location which would provide the future occupants with easy access to existing services and facilities by a choice of means of transport and would also make a contribution to the continued viability of these services and facilities. The SA therefore envisaged that both options could have some positive impact on the objectives relating to improving the local accessibility of goods, services and amenities and reducing the need to travel.
- 5.62 The location is well-related to areas of deprivation in neighbouring Liverpool district and the appraisal considered that the investment in the area, together with the jobs created during the construction of the development, mean that both options could have some positive impact on the objectives of reducing poverty and social deprivation; and reducing unemployment. In addition, both options could have a positive impact on the objective of supporting the vitality and viability of local centres by leading to additional expenditure in the nearby local centre on Rimmer Avenue.
- 5.63 The appraisal did however consider that both options would have an adverse impact on a number of objectives, particularly those related to environmental issues. Part of the site is adjacent to a Local Wildlife Site and the site also contains significant areas of grassland which is an identified Priority Habitat. The appraisal therefore concluded that both options could have a negative impact on the objective relating to biodiversity unless appropriate mitigation measures are implemented. In particular, the degree of impact on this objective could be reduced by undertaking ecological studies and retaining areas of woodland. It is however recognised that it may not be possible to mitigate the impact of the potential development on the grassland within the location, which is identified as a priority habitat, without significantly reducing the developable area.

5.64 The SA also considered that both options could have a negative impact on the objective relating to adaptation to climate change due to them resulting in development taking place in a location that is potentially susceptible to groundwater flooding and due to both options resulting in the loss of a greenfield site that could help mitigate the higher summer temperatures expected to occur as a result of climate change. However, Option 1 is likely to have a more significant negative impact on this objective as it could also result in development taking place within Flood Zones 2 and 3 as defined by the SFRA, although it is acknowledged that any development under this option would be subject to the application of the sequential and exception tests. Key mitigation measures are likely to include undertaking more detailed site-specific flood risk assessments and applying the sequential test and exception tests.

5.65 The appraisal also noted that both options could have some negative impact on the objectives relating to landscape character; green infrastructure; and protecting land and soil. It is envisaged that both options would not have a negative impact on any other objectives but the presence of Childwall Brook within the site under Option 1 means that this option would have an uncertain impact on the objective relating to water quality. The impact of both options on the objective relating to mitigating climate change is also considered to be uncertain.

KGBS 19 and 20 – East of Halewood

5.66 Policy SUE1 identifies East of Halewood as a SUE which will be primarily for residential development. As part of the appraisal of this site, four potential options were considered. The first was to allocate the site for housing development with no site-specific allocations for ancillary uses and no phasing restrictions. The second option considered was to allocate the site for housing development with no site-specific allocations for ancillary uses but with phasing restrictions. The third option was to allocate the site for housing development with site-specific allocations for retail and public open space but with no phasing restrictions. The fourth option was to allocate the site for housing development with no site-specific allocations for ancillary uses and no phasing restrictions but exclude the parts of the site that are subject to flood risk.

5.67 The appraisal of these options concluded that each of the options has the potential to have a positive impact on a wide range of objectives. In particular, given the substantial quantum of residential development that would be delivered on the site under each of the options, the appraisal considered that all four of the options have the potential to have a major positive impact on the objective of providing good quality housing and also on its sub-objective of providing a wider choice of accommodation to create a greater tenure mix. This impact would

become increasingly significant as the development is built out. The quantum of development that would be delivered under each of the options could also generate employment and training opportunities in the construction sector, stimulate investment in the wider area, support the continued viability of existing education and training facilities and potentially bring new jobs into the wider area. As such, the appraisal noted that each of the options has the potential to have a positive impact on the objectives that relate to poverty and deprivation; education and skills; business growth and the competitiveness of businesses; and unemployment. The impact of Option 2 on each of these objectives is however likely to be delayed due to the phasing restrictions increasing the likelihood that the site would come forward later in the plan period.

- 5.68 The appraisal noted that each of the options would also have a positive impact on the objective that relates to access to services, facilities and amenities. Nevertheless, it considered that there is a greater level of certainty that Option 3 would have a positive impact on this objective as it would result in retail and other local facilities being provided on the site itself. The provision of these on-site local facilities means that Option 3 could also have a positive impact on the objective that relates to health if these facilities were to include a GP/medical centre. However, as it is presently unknown whether such facilities would be provided it is considered that the impact of Option 3 on this objective is uncertain.
- 5.69 Each of the options was also considered to have the potential to have a major positive impact on the objective of enhancing the vitality and viability of town and local centres by generating a significant amount of additional expenditure in nearby centres. Option 3 would however support the provision of some retail development on the site. Whilst other policies in the Plan should ensure that any retail provision is appropriate in scale, the provision of this retail area could reduce the benefits of the development for other local centres in the area. As such, the appraisal considered that there is a lower level of certainty that this option would have a significant positive impact on the objective.
- 5.70 The appraisal did however conclude that each of the options could have a negative impact on a number of objectives. Each option would result in the development of a significant area of greenfield land and could result in the loss of landscape features and areas of priority habitat. Options 1, 2 and 3 could also result in development taking place in close proximity to a Local Wildlife Site. As such, the appraisal considered that each of the options has the potential to have a major negative impact on the objective of protecting land and soil; and some negative impact on the objectives that relate to landscape character; biodiversity; and green infrastructure. However, as Option 3 would make site specific allocations for public open space, there is a lower

level of certainty that this option would have a negative impact on the objective that relates to biodiversity. Conversely, as Option 4 would exclude the parts of the site that are subject to flood risk, it would also result in the creation of an inconsistent and potentially more vulnerable Green Belt boundary and, as a result, there is a higher level of certainty that this option would have a negative impact on the objective that relates to landscape character. The impact of Option 2 on each of these objectives is likely to be delayed due to the phasing restrictions increasing the likelihood that the site would come forward later in the plan period.

- 5.71 The appraisal indicates that each of the options would have the potential to have a negative impact on the objectives that relate to built heritage; mitigating climate change; and air quality. Options 1, 2 and 3 could also have a major negative impact on the objective that relates to adapting to climate change as each of these options could result in development taking place in an area that is at risk of flooding and would also result in the loss of a substantial area of greenfield land that has the potential to provide habitat for species and help mitigate higher summer temperatures.

KGBS 8 - Land bounded by A58, Prescott

- 5.72 Policy SUE1 identifies Land bounded by A58, Prescott, as a SUE which will be primarily for residential development. As part of the appraisal of this site, three potential options were considered. The first was to allocate the site for housing development and urban greenspace with an assumed density of 25 dwellings per hectare. The second option considered was to allocate the site for housing development across the entire site. The third option was to allocate the site for housing development and urban greenspace with an assumed density of 30 dwellings per hectare.

- 5.73 The appraisal of the options for the land bounded by the A58, Prescott concluded that each of the options has the potential to have a number of positive impacts on the sustainability objectives. Each of the options could make an important contribution to the housing needs identified in the Strategic Housing Market Assessment (2010) and have a major positive impact on the objective of providing good quality housing. The site is also within close proximity of Prescott town centre which, according to the Knowsley Town Centre and Shopping Study (2009), has suffered a loss of vitality and viability in recent years. Given the notional capacity of the site under each of the three options and its proximity to the town centre, the appraisal also considered that each of the options could have a positive impact on the vitality and viability of this centre by increasing levels of expenditure within it and each option could therefore have a major positive impact on this objective. Each of the options would also have the potential to have a positive impact on a number of other objectives, including those relating to reducing poverty

and social deprivation; reducing the need to travel; and reducing long term unemployment. The appraisal also noted that each of the options could have a positive effect on the objective that relates to improving access to goods, services and amenities although there is only a low level of certainty that Option 2 would have a positive impact on this objective as this option could result in the loss of playing fields.

- 5.74 The appraisal did however note that each of the options would however result in housing being built on a predominantly greenfield site and, unless appropriate mitigation measures are implemented, could also lead to the loss of areas of priority habitat and mature trees which contribute to the character of the area. The appraisal therefore considered that each of the options for the site has the potential to have a negative impact on the objectives that relate to the local character of the landscape and biodiversity, particularly if they result in the loss of protected trees and areas of woodland. The impact on these objectives could however potentially be reduced through securing appropriate landscaping and on-site open space provision, undertaking ecological surveys and protecting areas of woodland.
- 5.75 By resulting in the loss of a predominantly greenfield site which offers the potential to function as part of the Borough's Green Infrastructure network and by also having the potential to impact upon areas of Priority Habitat within the site, the appraisal concluded that each of the options could also have a negative impact on the objectives that relate to green infrastructure; adaptation to climate change; and protecting land and soil. Options 1 and 3 would however mitigate against some of the loss of greenfield land by providing protection to the playing fields within the site. By contrast, Option 2 would result in the loss of a greater area of greenfield land and would have a more significant negative impact on the objective. By resulting in the loss of playing pitches associated with a school, the appraisal considered that Option 2 could also have a negative impact on the objective that relates to health and an uncertain impact on the objective that relates to education and skills. Conversely, Options 1 and 3 restrict the developable areas to outside the outdoor sporting provision and would designate this area as urban greenspace. Both of these options would therefore protect opportunities for sport and recreation and could therefore have a positive impact on the objective that relates to health.
- 5.76 Each of the options would result in development taking place in close proximity to Prescott Conservation Area and a number of listed buildings. The appraisal therefore recognises that each option could therefore impact on the setting of designated heritage assets. The setting of some of these listed buildings is however already heavily influenced by modern development and it is recognised that Prescott Conservation Area is included on English Heritage's Heritage at Risk Register. Consequently, whilst each of the options could affect the



setting of the north western part of the conservation area, the development proposed could generate additional investment in the area and thereby help contribute to the conservation and enhancement of this historic asset. As a result, there is only a low level of certainty about the impact of any of the options on this objective. Nevertheless, given that Option 3 has a higher assumed density of 30dph there is less scope for this option to adopt a sympathetic design and it is considered that this option has a greater potential to have a negative impact on the setting of designated heritage assets.

KGBS 7 - Knowsley Lane, Huyton

- 5.77 Policy SUE1 identifies Knowsley Lane, Huyton, as a SUE for residential and employment development. As part of the appraisal of this site, four potential options were considered. The first was to allocate the site for mixed use development (at least 80% employment) with areas of Public Open Space / Outdoor Sporting provision removed from the Green Belt but retained in such uses. Employment uses would comprise of business uses (Use Class B1) or other uses within the LCR key economic sectors provided that the use would not cause detriment to the amenity of nearby residents. The second option considered was as per Option 1 but with the areas of Public Open Space / Outdoor Sporting provision being excluded from the allocated site. The third option was to allocate the entire site for employment development only. Employment uses would comprise of business uses (Use Class B1) or other uses within the LCR key economic sectors provided that the use would not cause detriment to the amenity of nearby residents. The fourth option was to allocate the entire site for employment development with no restrictions on uses.
- 5.78 The appraisal concluded that each of the options for Knowsley Lane would have a positive impact on a number of sustainability objectives. In particular, as all four of the options would result in at least 80% of the developable area being used for employment development, it concluded that each option could result in the provision of high quality employment premises that provide accommodation for new businesses, stimulate investment in the area and help support the creation of a range of employment opportunities. As such, the appraisal considered that all four of the options would have the potential to have a positive effect on the objectives that relate to improving the competitiveness and productivity of business; and reducing unemployment. The impact of each of the options on these objectives is likely to become increasingly significant as the development is built out. However, as Option 3 and 4 are likely to result in a greater quantum of employment development there is a greater level of certainty that these options would have a major positive impact on the objective that relates to the competitiveness and productivity of business.

- 5.79 The development that would take place in this location under each of the options could also generate a number of training opportunities. Accordingly, the appraisal noted that each option has the potential to have a positive impact on the objective that relates to education and skills. The appraisal also considered that each of the options could have a positive impact on the objective that relates to reducing poverty and social exclusion. However, as Option 3 and 4 are likely to result in a greater quantum of employment development, these options have the potential to have a greater positive impact on the objective. Other objectives that all four options could have a positive impact on include those that relate to the vitality and viability of Knowsley's town centres; and reducing the need to travel.
- 5.80 The appraisal did however note that each of the options has the potential to have a negative impact on a number of objectives. In particular, although Options 1 and 2 would support the retention of existing public open space/playing pitches, each of the options would result the loss of a large area of greenfield land and could also lead to the loss of priority habitat. As such, each of the options has the potential to have a negative impact on the objectives that relate to biodiversity; green infrastructure; and protecting land and soil. Options 3 and 4 would have a more significant negative impact on the objectives that relate to green infrastructure and protecting land and soil due to the fact that both of these options would result in the loss a greater area of greenfield land, including public open space. Key mitigation measures are likely to include retaining areas of priority habitat and ensuring that new development is built to an appropriate density. Each of the options could also have a negative impact on the objectives that relate to air quality; Knowsley's built heritage; mitigating climate change; and adapting to climate change. Each option would also have a negative impact on the objective that relates to landscape character. Option 2 would however result in there being an incongruous Green Belt boundary and, as a result, there is a higher level of certainty that this option could have a negative impact on landscape character.
- 5.81 The appraisal recognised that both Options 1 and 2 would support the provision of dwellings on the site and could therefore have a positive effect on the objective of providing good quality, affordable and resource efficient housing. Conversely, as Options 3 and 4 would result in a site that had previously been identified for some residential development being used entirely for employment uses, the appraisal concluded that both of these options have the potential to have a negative impact on the objective. Options 1 and 2 would result in the provision of a mixed use development which benefits from increased activity and natural surveillance throughout the day and which is well-related to existing services and facilities. Both of these options would also retain areas of public open space which provide opportunities for sport and recreation on the site. Consequently, the appraisal concluded

that these two options have the potential to have a positive effect on the objectives concerned with access to services and facilities; crime and fear of crime; and health. By contrast, as Options 3 and 4 would lead to the loss of the areas of public open space they could reduce the opportunities to participate in sport and recreation and could have a negative effect on the objectives that relate to health and access to services and facilities.

KGBS 14 - South of Whiston

- 5.82 Policy SUE1 identifies South of Whiston as a SUE primarily for residential development. As part of the appraisal of this site, three potential options were considered. The first was to allocate the site for housing development including the Local Wildlife Site but excluding Public Open Space. This option would not introduce any phasing restrictions but would include a policy requirement for ancillary facilities (e.g. Retail and Public Open Space). The second option considered was to allocate the site for housing development with site-specific allocations for retail and Public Open Space provision but no phasing restrictions. The third option was to allocate the entire site for housing development with no phasing restrictions.
- 5.83 The appraisal concluded that each of these would have a similar impact on a number of the sustainability objectives. In particular, given the substantial capacity of the site, it concluded that each option could have a major positive impact on the objective of providing good quality housing and that this impact would become increasingly significant as the development is built out. However, by introducing a potentially inflexible approach to the provision of open space and retail, the appraisal recognised that Options 2 could have an adverse impact on the deliverability of the site which reduces the level of certainty that the option would have a major positive impact on the objective. Due to the size of the area and the quantum of development it could accommodate, each of the options could also generate a number of employment and training opportunities in the construction sector and could stimulate further investment in the area. As such, the appraisal noted that each of the options has the potential to have a positive impact on the objectives that relate to reducing deprivation; skills and training; business competitiveness; and unemployment.
- 5.84 The appraisal considered that each of the options would also result in development taking place in close proximity to a range of local facilities and amenities including primary schools, a GP and health centre and a local centre on Greene's Road and development in this location could make a contribution to the continued viability of these services and facilities. Options 1 and 2 would also support the provision of certain facilities/amenities within the site. As such, each of the options could have a positive impact on the objective that relates to access to services and amenities but there is a higher level of certainty that

Options 1 and 2 would have a positive impact on this objective due to these options resulting in the provision of facilities on-site. Given the significant capacity of the site, each of the options also has the potential to have a positive impact on Knowsley's town centres and the local centre on Greene's Road by increasing levels of expenditure in these centres. As such, each option could have a major positive impact on the objective that relates to the vitality and viability of Knowsley's town centres

- 5.85 The appraisal did however recognise that each of the options could impact upon the setting and significance of a number of heritage assets and have a negative impact on the objective that relates to Knowsley's built heritage. These assets are however located towards the edges of what is a large site and there may be scope to incorporate an adequate buffer around these assets to protect their setting. Consequently, there is only a limited level of certainty that each option would have a negative impact on this objective. By resulting in the loss of a significant area of greenfield land and by potentially placing pressure on areas of ecological value, each option could also have a negative impact on the objectives that relate to landscape character; biodiversity; and green infrastructure; and a major negative impact on the objective of protecting land and soil. Due to the quantum of development that would be delivered under each of the options and the number of associated vehicle trips, each option could also have a negative impact on the objective that relates to air quality. There is however a lower level of certainty that Options 1 and 2 would have a negative impact on this objective as both of these options would support the provision of some facilities on the site which could reduce the need to travel and associated vehicle emissions. Each option could also have a major negative impact on the objective of adapting to climate change; a negative impact on the objective of mitigating climate change; and an uncertain impact on the objective that relates to protecting water quality.
- 5.86 Each option would result in the loss of a substantial area of greenspace, sections of which are used for informal recreation, and could therefore reduce opportunities for participation in informal sport and recreation and thereby have a negative impact on the objective that relates to health. Nevertheless, Options 1 and 2 would provide support for the retention/provision of areas public open space and could therefore have a positive impact on the objective. Conversely, Option 3 would not support the retention/provision of areas public open space and would therefore have a negative impact on the objective. Options 1 and 2 would also result in the provision of some facilities on the site which could help reduce the need to travel and have a positive impact on the objective that relates to reducing the need to travel and improving the use of more sustainable transport modes. By contrast, as

Option 3 would not directly support the provision of on-site facilities, this option has the potential to have a negative impact on this objective.

KGBS 10 - Land at Carr Lane, Prescott

- 5.87 Policy SUE1 identifies *Land at Carr Lane, Prescott*, as a SUE primarily for residential development. As part of the appraisal of this site, three potential options were considered. The first was to allocate the site for housing development with no phasing restrictions. The second option considered was to allocate the site for housing development with phasing restrictions. The third option was to allocate the site for employment development with no phasing restrictions.
- 5.88 The appraisal of Land at Carr Lane, Prescott concluded that each of the options has the potential to have a positive impact on a number of sustainability objectives. The site forms part of the former Prescott waste water treatment works and its redevelopment is likely to need to be preceded by a comprehensive scheme of land reclamation/land remediation. The appraisal therefore noted that each of the options has the potential to have a positive effect on the objective that relates to land and soil quality and its sub-objectives of reducing the amount of derelict land and reducing the amount of contaminated land. The impact of Option 2 on this objective is however likely to be delayed due to the phasing restrictions increasing the likelihood that the site would come forward later in the plan period.
- 5.89 Each of the options would also result in development taking place in a location that is within 800m of a railway station and which is also in relatively close proximity to bus routes and within a cycle buffer zone. As such, the appraisal considered that each option has the potential to have a positive effect on the objective that relates to reducing the need to travel and improving the use of more sustainable modes of transport. Given the proximity of the site to Prescott town centre, each of the options could also have some positive impact on this centre by increasing the number of people using the centre. As such, each option could have a positive effect on the objective that relates to the vitality and viability of Knowsley's centres. However, the impact of Option 2 on this objective is likely to be delayed due to the phasing restrictions increasing the likelihood that the site would come forward later in the plan period.
- 5.90 The appraisal did however conclude that each of the options would have an uncertain impact on the objectives that relate to water quality and mitigating climate change and could also have a negative effect on the objectives that relate to biodiversity and adapting to climate change.
- 5.91 Neither Option 1 nor Option 2 includes an employment element. In addition, given the size of the site, the scale of development that would be delivered under either of these options is unlikely to be sufficient to

stimulate further investment in the area. Both options would however result in the loss of a previously identified employment site and could therefore lead to a reduction in the flexibility of employment land supply within the plan period. As such, both of these options could have a negative impact on the objectives that relate to economic competitiveness; and unemployment. By contrast, Option 3 could result in the provision of high quality employment premises that provide accommodation for new/expanding businesses and create a range of employment opportunities. Consequently, the appraisal considered that this option has the potential to have a positive impact on the objectives that relate to economic competitiveness; and unemployment; and also on the objectives that relate to poverty and deprivation; and skills and qualification. Nevertheless, as Options 1 and 2 would incorporate a residential element, these options could have a positive impact on the objectives that relate to access to services and facilities; and providing good quality housing, although the impact of Option 2 on these objectives is likely to be delayed due to the phasing restrictions increasing the likelihood that the site would come forward later in the plan period. By contrast, Option 3 would have no significant impact on these objectives.

KGBS 4 - East of Knowsley Industrial and Business Parks

- 5.92 Policy SUE1 identifies East of Knowsley Industrial and Business Parks as a SUE primarily for employment development. As part of the appraisal of this site, four potential options were considered. The first was to allocate the site for employment development and require high quality design / gateway enhancement. The second option considered was to allocate only the land to the south of the A580 for employment development and require high quality design / gateway enhancement. The third option was to allocate the site for employment development with no requirement in relation to high quality design / gateway enhancement. The fourth option was to allocate the site for employment development with phasing restrictions.
- 5.93 The appraisal of East of Knowsley Industrial and Business Parks concluded that each of the options has the potential to have a positive impact on a number of the sustainability objectives. In particular, each of the options could result in the provision of high quality employment premises which could have a positive impact on the objective that relates to improving the competitiveness and productivity of business, particularly as the site is adjacent to Knowsley Industrial and Business Parks which are identified by the Knowsley Industrial Park – Strategic Framework (2010) as a key location in the Borough for target sectors, such as advanced engineering and green energy. The appraisal also noted that each of the options could create a significant amount of employment and training opportunities and could thereby have a positive effect on the objectives that relate to skills and training; and reducing unemployment. The impact of Options 1, 3 and 4 on these

three objectives is likely to become increasingly significant during the plan period as the development is built out and by requiring development in this location to achieve a high standard of design, there is a greater level of certainty that Option 1 would act as a catalyst for further investment in the area and thereby have a major positive impact on these objectives. By contrast, the appraisal concluded that Option 2 is likely to have a less significant positive impact on these objectives than the other three options as it would restrict the amount of development that took place. The impact of Option 4 on these objective is likely to be delayed due to the phasing restrictions increasing the likelihood that the site would come forward later in the plan period.

- 5.94 By creating employment opportunities in a location that is located in relatively close proximity to areas of deprivation, the appraisal concluded that each of the options could also have a positive impact on the objective that relates to reducing poverty and securing economic inclusion.
- 5.95 Each of the options does however have the potential to have a negative impact on a number of objectives. Specifically, by potentially impacting on the significance of archaeological assets each of the options has the potential to have a negative impact on the objective that relates to Knowsley's built heritage. However, by not requiring high standards of design, there is a greater likelihood that any development that came forward under Options 3 and 4 will have an adverse impact on the setting of these heritage assets. Each of the options would result in the loss of an area of greenfield land and could therefore have a negative effect on the objectives that relate to green infrastructure and protecting land and soil. Each option could also have a negative effect on the objectives concerned with mitigating climate change; adapting to climate change; air quality; and sustainable transport. However, in all of these instances the impact of Option 4 on these objective is likely to be delayed due to the phasing restrictions increasing the likelihood that the site would come forward later in the plan period.
- 5.96 Knowsley Brook, which is defined as a Strategic Asset by the Liverpool City Region Ecological Framework (2011), runs through the northern part of the site. Options 1, 3 and 4 which involve development on this part of the site and could therefore place pressure on the ecological value of this brook. As such, the appraisal concluded that each of these options has the potential to have a negative impact on the objective that relates to biodiversity and would have an uncertain impact on the objective concerned with water quality. By contrast, Option 2 would not result in development taking place on the northern part of the site and is therefore unlikely to have any significant impact on this brook or on the either of these objectives.

KGBS 17 - Land south of M62



- 5.97 Policy SUE1 identifies Land south of M62 as a SUE primarily for employment development. As part of the appraisal of this site, three potential options were considered. The first was to allocate the site for employment development (at least 22.5 ha) and a country park. The second option considered was to allocate the site for employment development (22.5 ha) and a country park (40 ha). The third option was to allocate the site for employment development only.
- 5.98 The appraisal considered that each of these options would have a similar impact on a number of the sustainability objectives. In particular, due to the scale of employment development that would be delivered, each of the options could result in the provision of high quality employment premises that would provide accommodation for new businesses, stimulate investment in the area and create a range of employment opportunities. Consequently, each of the options could have a positive impact on the objectives that relate to increasing the number of new businesses and reducing unemployment and this impact would become increasingly significant as the site is built out. However, by introducing a potentially inflexible approach to the provision of a country park, Option 2 could have an adverse impact on the deliverability of the site which reduces the level of certainty that this option would have a major positive impact on the objective. In addition to supporting the creation of employment opportunities, each option could help create a number of training opportunities and, as such, the appraisal considered that each option has the potential to have a positive impact on the objectives that relate to poverty and deprivation; and education and training.
- 5.99 The appraisal did however conclude that each of the options would have the potential to have a negative or uncertain impact on a number of the sustainability objectives. In particular, each of the options has the potential to have a major negative impact on the objective that relates to mitigating climate change; and some negative impact on the objectives concerned with reducing the need to travel; and the prudent use of natural resources. Each of the options would result in the loss of a substantial area of greenfield land and the entire site is classified as Grade 2 Best and Most Versatile agricultural land. However, as a significant portion of the site has been previously developed and because the site contains former colliery land which is likely to be severely contaminated, the appraisal concluded that the impact on each of the options on the objective of protecting, managing and restoring land and soil is uncertain. The impact of each of the objectives on the objective that relates to landscape character is also considered to be uncertain.
- 5.100 Each of the options for the Land south of M62 could have a major negative impact on the objective that relates to biodiversity if the development that took place on the site resulted in the loss or priority

habitat or placed additional pressure on adjacent Local Wildlife Sites. The appraisal did however consider that there is a lower level of certainty that Options 1 and 2 would have a negative impact on this objective as by requiring the provision of a country park these options would provide more scope for avoiding built development in the vicinity of the LWSs and could lead to retention of additional areas of Priority Habitat. Similarly, although each of the options could have a negative impact on the objective that relates to air quality due to the vehicular emissions associated with the development, there is a greater level of certainty that Option 3 would have a negative impact on this objective as it would result in the delivery of a higher quantum of development.

- 5.101 By supporting the delivery of a country park which could provide enhanced opportunities for informal sport and recreation and which could function as part of the Borough's Green Infrastructure network, the appraisal concluded that Options 1 and 2 could also have a positive effect on the objectives that relate to health; and green infrastructure. By contrast, Option 3 would be unlikely to have any significant effect on the objective that relates to health and would have the potential to have a negative effect on the objective of conserving green infrastructure.
- 5.102 The site contains a Listed Building and there are identified Archaeological Sites along the eastern and southern boundary of the site. Each option could direct a significant scale of development to the vicinity of these heritage assets and could therefore adversely affect their setting. However, as these features are primarily along the edges of what is a large site, there may be scope to incorporate adequate buffers around the setting of these assets to protect their significance, particularly under Options 1 and 2 which require the provision of a country park. As a result, the appraisal concluded that Options 1 and 2 are unlikely to have a significant impact on the objective. Conversely, as Option 3 would result in the site being developed solely for employment uses, this option could have a negative impact on this objective.

KGBS 6 - Land at Knowsley Village

- 5.103 Policy SUE1 identifies Land at Knowsley Village as "safeguarded land" for residential development. The policy specifies that this site is not allocated for development at the present time as it is proposed that development in this location will take place after 2028. As part of the appraisal of this site, three potential options were considered. The first was to safeguard for housing development post 2028 unless it is required to meet shortfalls in the 'deliverable' housing land supply. The second option considered was to allocate the site for housing development with no phasing restrictions. The third option was to allocate part of the site for housing development with no phasing restrictions and safeguard the remainder for post 2028.



- 5.104 The appraisal of these options concluded that each of the options would have a similar impact on the sustainability objectives. However, the timescale over which these impacts would be likely to occur would vary between each of the options. In particular, Option 1 would safeguard the site for housing development post 2028 unless it is required to meet shortfalls in the 'deliverable' housing land supply before this date. As a result, this option is unlikely to have any significant impacts on many of the objectives until the site comes forward for development post 2028. Conversely, by allocating the site for housing development with no phasing restrictions, it is anticipated that Option 2 could have an impact on many of the objectives from the early part of the plan period. Option 3 is essentially a hybrid approach whereby part of the site would be allocated for housing development with no phasing restrictions and the remainder would be safeguarded for post 2028. Consequently, although this option could have an impact on many of the objectives from the early part of the plan period, in many instances the full extent of the impact on the objectives does not occur until post 2028 when the remainder of the site is likely to come forward.
- 5.105 Given the substantial capacity of the site, the appraisal considered that each of the options could have a major positive impact on the objective of providing good quality housing and its sub-objective of providing a wider choice of accommodation to create a greater tenure mix. However, as noted above, the timescale over which this impact would occur is likely to vary between each of the options. Each option could significantly increase the levels of expenditure in nearby town and local centres and could therefore have a significant positive impact on the objective that relates to enhancing the vitality and viability of town and local centres. Other objectives which all three options could have a positive impact on include those which relate to poverty and social deprivation; access to goods, services and amenities; education and skills; the competitiveness of businesses and business growth; and unemployment.
- 5.106 Each of the options does however have the potential to have a negative impact on a range of objectives. In particular, each of the options would result in the loss of a significant area of greenfield land and could also result in the loss of trees and other landscape features and place pressure on areas of priority habitat and an adjacent Local Wildlife Site. As such, the appraisal concluded that each option has the potential to have a major negative impact on the objectives that relate to landscape character; green infrastructure; and protecting land and soil; and some negative impact on the objective that relates to biodiversity. However, in each of these instances, the timescale over which this impact would occur is likely to vary between the three options. Key mitigation measures are likely to include retaining existing trees and priority habitat, securing appropriate landscaping, securing the provision of on-

site open space and ensuring any development is built to an appropriate density to minimise the need to release further greenfield sites. Given the quantum of development that would be delivered on the site and the number of associated vehicle trips that are likely to be generated, the appraisal considered that each of the options has the potential to have a major negative impact on the objective of protecting air quality. Each of the options could also have a major negative impact on the objective that relates to reducing the need to travel and the use of sustainable modes of transport; and some negative impact on the objectives that relate to Knowsley's built heritage; mitigating climate change; adapting to climate change.

5.107 Each of the options would result in a residential development that is likely to be of a scale which may facilitate the provision of on-site services and amenities. Each option would however result in the loss of a substantial area of greenspace, sections of which are used for informal recreation, although it is acknowledged that the Green Space Audit (2012) did establish that this area has an overall surplus of public open space relative to the Council's adopted standards and it is also recognised that the presence of areas of greenspace does not necessarily ensure participation in informal recreation. It is therefore considered to be uncertain whether each of the options would have a significant impact on the objective that relates to health.

Alternative Sites Appraisal

5.108 As part of the preparation of the Core Strategy, a series of potential locations for release from the Green Belt to meet the borough's housing needs were considered and were appraised by the SA. One site that was considered during the preparation of the plan but which was not identified as a 'reserve location' in the Core Strategy Submission document was the land at Lydiate Lane, Halewood.

5.109 Since the Core Strategy was submitted for examination, a revised boundary for this site has been proposed by the landowner. Consequently, in order to consider the implications of this amendment on the performance of this site in the SA process, the revised proposals for Lydiate Lane has been re-appraised. A summary of the outcomes of this appraisal is provided below and the full appraisal is presented in Appendix F. Appendix H provides a matrix that summarises the performance of the revised proposals for Lydiate Lane in comparison to the original appraisal of this site.

5.110 Since the Core Strategy was submitted for examination, a further alternative site for release from the Green Belt has been suggested to the Council and discussed at the Core Strategy examination hearings in November 2013. This site, Land at Burtons Way, has therefore also been appraised.

5.111 A summary of the outcomes of the appraisal of both of these sites is provided below and the full appraisals are presented in Appendix F. Appendix H provides a matrix that summarises the performance of the revised proposals for Lydiate Lane in comparison to the original appraisal of this site.

Alternative D (b) - Lydiate Lane, Halewood (revised boundary)

5.112 The revised proposals for the Land at Lydiate Lane would have a positive impact on a number of objectives. In particular, the revised proposals could have a positive impact on the objective relating to providing good quality, affordable and resource efficient housing; and its sub-objective or providing a wider choice of accommodation to create a greater tenure mix. The degree of impact on this objective is however less significant than the potential impact of the earlier proposals for the site due to the reduced quantum of development that would be delivered. The reduced scale of development that would be delivered mean that the revised proposals would no longer have a significant impact on the objectives that relate to the economic objectives or the objective of reducing poverty and social deprivation.

5.113 The revised proposals would result in development taking place in a location that is in relatively close proximity of a number of local facilities, including a primary school, a local shopping parade, a medical centre, pharmacy and day care facilities and also the shopping centre at Belle Vale. It is therefore considered that overall the proposal would lead to the provision of housing in a location which would provide the future occupants of the site with relatively easy access to existing services and facilities by a choice of means of transport. Consequently, the revised proposals could have some positive impact on the objectives concerned with access to goods and services and reducing the need to travel.

5.114 The appraisal of the revised proposals for Lydiate Lane did however identify a number of possible negative impacts on the sustainability objectives. In particular, due to the proposals resulting in the loss of an area of greenfield land within an essential gap in the Green Belt as identified by the Knowsley and Sefton Green Belt Study – Knowsley Report (2012), it is considered that the proposals could have a negative impact on the objectives relating to protecting land and soil; local landscape character; and conserving green infrastructure. The revised proposals for Lydiate Lane also still have the potential to adversely affect the setting and significance of archaeological sites and features and could therefore have a negative impact on the objective of preserving, enhancing and managing Knowsley's rich diversity of cultural, historic and archaeological buildings, areas, sites and features. The impact on some of these objectives would be difficult to mitigate wholly. In particular, development in this location would inevitably result

in the loss of a greenfield and, as such would unavoidably impact upon the objective relating to protecting land and soil quality and its sub-objective of directing new housing to previously developed land.

- 5.115 The revised proposals for Lydiate Lane would also have an uncertain impact on the objectives that relate to adapting to and mitigating climate change.

Alternative E - Land at Burtons Way

- 5.116 The provision of housing on the Land at Burtons Way would have the potential to have some positive impacts on the sustainability objectives. In particular, it could contribute towards Kirkby's housing needs and help broaden the choice of accommodation and tenure mix in the area. Although it is acknowledged that the proximity of the site to the motorway could provide a relatively poor environment for the occupiers of the development. The proposed use of the site would also result in the provision of housing in a location that is well-related to existing bus and cycle routes and which is in relatively close proximity of a local centre. Accordingly, the use of the site for housing could have some positive impact on the objectives relating to the accessibility of goods and services; reducing the need to travel; and enhancing the vitality and viability of Knowsley's town and local centres.

- 5.117 Nevertheless, due to the relatively limited capacity of the location, the SA considered that the potential development of the Land at Burtons Way would not have a significant impact on many of the objectives. In addition, the appraisal process has also highlighted that the proposed use of the site for housing could have a negative or uncertain impact on several sustainability objectives.

- 5.118 In particular, the proposed use of the site could have a major negative impact on the objective of adapting to climate change by resulting in development taking place in a location that is susceptible to fluvial and groundwater flooding and through resulting in the loss of habitat. The potential development of this location would also lead to the loss of a greenfield site which comprises almost entirely of Grade 2 Best and Most Versatile agricultural land. It is therefore considered that it would have a negative impact on the objective of protecting land and soil and its sub-objective of directing new development to previously developed land. Whilst this impact cannot in itself be mitigated, it is recommended that ensuring development is built to an appropriate density could help minimise the need to release further greenfield sites.

- 5.119 The site also falls within the M57 Green Belt Corridor 'Strategic Green Link' and the Knowsley and Sefton Green Belt Study – Knowsley Report (2012) concludes that development in this location would be likely to have a small-scale negative impact on the integrity of this Strategic Green Link and would also reduce the gap between Kirkby

and Liverpool. The potential development may also result in the loss of habitat and could impact on a Local Wildlife Site which is immediately adjacent to the site. It is therefore considered that the potential development may have a negative impact on the objectives relating to local landscape character; biodiversity; and green infrastructure. Key mitigation measures to reduce the level of impact on these objectives are likely to include securing appropriate landscaping and on-site open space provision and undertaking ecological surveys.

- 5.120 The development of the site would result in housing being built in close proximity to Ingoe Lane Conservation Area, which presently has the appearance of a quiet enclave in a rural area, and could also impact on the setting of an archaeological site immediately to the east of Land at Burtons Way. As such, the proposed use of the site would have an uncertain impact on the objective that relates to preserving and enhancing Knowsley's cultural heritage. The impact of the potential development on the objective relating to mitigating climate change is also considered to be uncertain.

Local Plan: Core Strategy Policy Modifications Appraisal

- 5.121 The analysis of the Schedule of Modifications and Schedule of Further Modifications highlighted that a number of the other proposed amendments to the Plan (in addition to the new SUE policies which are referred to above) could generate significant effects and impact on its performance in the SA process. Accordingly, an appraisal of these modifications has been undertaken. A summary of the outcomes of the appraisal of these revised policies is provided below and the full appraisal is presented in Appendix G. Appendix H provides a matrix that summarises the performance of each of these amended policies in the SA process in comparison to the version of the policies that was included in the Core Strategy: Local Plan Submission document.

CS2: Development Principles

- 5.122 As with the version of Policy CS2 that was included within the Core Strategy Submission document, it is considered that the revised version of the policy would have a positive effect on a wide range of social, environmental and economic objectives and would not have an uncertain or negative impact on any of the objectives.
- 5.123 Nevertheless, the proposed modifications would improve the performance of the policy in the sustainability appraisal process in a number of regards. In particular, the policy has been amended so that the development principles place a greater emphasis on meeting housing and employment needs and other service provision. As a result, it is considered that the proposed modifications would result in the policy having a more significant positive impact on the objectives that relate to reducing poverty and social deprivation; providing good

quality housing; and improving the competitiveness of business and increasing the number of new businesses.

- 5.124 The proposed modifications to policy CS2 would also ensure that the development principles are reflected in subsequent stages of Local Plan preparation as well as to new development. This modification would emphasise the positive impacts of the policy and, as a result, would increase the level of certainty that the policy would have a positive impact on each of the objectives that it would have a significant impact on.
- 5.125 The proposed modifications would not have any other significant impacts on the performance of the policy in the sustainability appraisal process. For instance, by encouraging development that tackles deprivation by, amongst other things, reducing health inequalities and providing opportunities for positive lifestyle choices and health improvement, the revised policy would still have a major positive effect on the objective relating to health. Reducing carbon emissions is still listed as a key development principle in the revised policy and it also states that new development will be supported where it contributes to reductions in carbon dioxide from all sources. The development principles also still seek to reduce the need to travel and achieve a shift towards more sustainable modes of transport by promoting the use of public transport, walking and cycling. It is therefore considered that the revised policy still has the potential to also have a major positive effect on the objectives relating to mitigating climate change; and reducing the need to travel; and some positive effect on the objective of protecting air quality.
- 5.126 The revised policy would also still include development principles that relate to the protection of environmental assets and the quality of places which should ensure that it has a positive effect on the objectives relating to Knowsley's built heritage; landscape character and accessibility; biodiversity and geodiversity; green infrastructure; land and soil; and water quality.
- 5.127 The amended policy would also continue to encourage new development to make the most efficient use of available resources by promoting efficiency in resource use, including the reuse and recycling of materials. Accordingly, it is considered that the revised policy should still have a positive effect on the objectives of using water and mineral resources prudently and minimising the production of waste.

CS4: Economy and Employment

- 5.128 The proposed modifications to the policy would have some positive impact on the performance of the policy in the sustainability appraisal process. For instance, although the version of the policy included in the Core Strategy Submission document already sought to direct retail and

town centre uses to existing town centres, the proposed modifications would ensure that preference is given to accessible edge of centre and out of centre locations that are well connected to town centres when town centre uses need to be accommodated outside of a centre. As a result, the proposed modifications increase the level of certainty that the policy would have a positive impact on the objective of improving accessing to services, facilities and amenities.

5.129 As with the version of the policy that was included in the Core Strategy Submission document, the amended policy would allow for the release of Green Belt land to meet employment land need. The proposed modifications would however remove the phasing for the release of these sites and would therefore permit their removal from the Green Belt earlier in the plan period. As such, it is considered that the major positive impact on the objective that relates to poverty and deprivation would now occur sooner in the plan period. This modification would however mean that the policy also has the potential to have an uncertain impact on the objective that relates to protecting land and soil earlier in the plan period.

5.130 The proposed modifications to the policy would not affect the performance of the policy against any of the other sustainability objectives. The policy would still provide support for sustainable economic growth; provide sufficient land to meet employment development needs; would improve accessibility to an appropriate range of jobs; and address skills and educational barriers to employment. Although the modifications to the plan would reduce the minimum employment land requirements for the plan period it is considered that this would not have a significant impact on the performance of the policy. As such, it is envisaged that the policy would have a major positive effect on the objectives relating to improving the competitiveness of business and increasing the number of new businesses; and maintaining high and stable levels of employment; and some positive effect on the objective relating to improving opportunities for lifelong learning and employability. The revised policy does however still encourage recruitment targeted towards communities living in and around the development site and it is recognised that this may not include areas of greatest deprivation. This reduces the degree of certainty that the policy would have a major positive effect on reducing long-term unemployment.

5.131 The revised policy still seeks to direct retail and town centre leisure uses to existing town centres. The proposed amendments to the policy would also ensure that where town centre uses are required in a non-centre location preference will be given to edge of centre and out of centre proposals that are accessible and well connected to the town centre. It is therefore considered that the revised policy would continue to have a major positive effect on the objective of enhancing the vitality

and viability of town and local centres. Directing retail and town centre leisure uses to existing town centres, which are all considered to be accessible by public transport, should also have some positive effect on the objectives relating to protecting air quality; and improving the use of more sustainable modes of travel. The promotion of mixed use employment/residential schemes and encouragement given to home working through improvements to digital communications and telecommunications infrastructure should also ensure the policy has a positive effect on the objectives relating to air quality and improving the use of more sustainable modes of travel. The policy does however state that transport linkages between housing and employment areas will be improved but it does not specify by what means of transport. This reduces the level of certainty that the policy would have a positive effect on the objective of improving the use of sustainable transport modes.

- 5.132 Although the amendments to the policy provide added support for emerging employment sectors, which is likely to include the low carbon sector, it is considered that the revised policy would still have an uncertain impact on the objective that relates to mitigating climate change. The effect of the policy on the objective relating to minimising the production of waste is also considered to be uncertain. The effect of the policy on the objective relating to minimising the production of waste is also considered to be uncertain.

CS5 - Green Belt

- 5.133 The revised policy would have a largely similar impact on the sustainability objectives to the version of the policy included in the Core Strategy Submission document.
- 5.134 The policy would continue to protect the majority of Green Belt from inappropriate development but, as with the previous version of the policy, would support the identification of a series of sites for release from the Green Belt to ensure that there is sufficient housing and employment land to meet the needs of the Borough. However, the proposed modifications to the policy would mean that the release of these Sustainable Urban Extensions (SUEs) is no longer controlled by a phasing mechanism and the modifications would also result in these sites being allocated for development rather than just identified as broad locations. These modifications mean that the SUEs would now be more likely to come forward earlier in the plan period. As a result, many of the impacts that would have occurred in the longer term under the version of the policy included in the Core Strategy Submission document would now occur earlier in the plan period under the revised policy.
- 5.135 By continuing to support the identification of SUEs and safeguarded land for housing and employment development the amended policy



would continue to ensure that there is sufficient land to meet the Borough's development requirements. It is therefore envisaged that the revised policy would still have a positive effect on the objectives relating to poverty and deprivation; housing; the growth potential of business sectors; and maintaining high and stable levels of employment. However, as noted above, these impacts are now predicted to occur earlier in the plan period. In addition, by potentially resulting in the SUEs coming forward earlier in the plan period, the modifications to the policy could result in the SUEs competing with the Council's regeneration objectives for urban areas. As a result, the modifications to the policy reduce the level of certainty that it would have a positive impact on the objective that relates to poverty and deprivation.

- 5.136 In addition, as the amended policy would result in some housing and employment development taking place in areas on a series of predominantly greenfield sites that are presently within the Green Belt, it could have a negative effect on the objective relating to land and soil and an uncertain effect on the objectives relating to landscape character and accessibility; and Green Infrastructure. Key mitigation measures to address some of these impacts will include ensuring new development is built to an appropriate density, retaining areas of woodland, securing the provision of on-site open space, and securing appropriate landscaping to moderate the impact of proposals on the local landscape character.
- 5.137 As some of the SUEs are used for informal recreation and others contain sports pitches, it is considered that the revised policy could also still have a long term negative impact on health. The proximity of some of the locations to designated heritage assets and the presence of archaeological assets within some of locations mean that the revised policy would also still have an uncertain impact on the objective relating to built heritage in the longer term. It is also considered that the policy still has the potential to have a negative impact on the objective relating to biodiversity. Undertaking ecological surveys, excluding areas of priority habitat from the developable area and the provision of on-site habitats are all likely to be key mitigation measures. However, as noted above, these impacts are now predicted to occur earlier in the plan period.
- 5.138 The revised policy still would have the potential to result in more dispersed patterns of development. In addition, the construction and operation of the development that would be delivered on the SUEs would inevitably result in carbon dioxide emissions. Consequently, and notwithstanding the fact that the Knowsley Local Plan Transport Feasibility Assessment (2012) identified that some of these locations have good accessibility to bus routes, cycle routes and services and facilities, it is considered that the revised policy would still have an

uncertain effect on the objectives relating to mitigating climate change; protecting air quality; and minimising the need to travel.

CS7: Transport Networks

- 5.139 The proposed modifications to the policy would not have a significant impact on the performance of the policy against the sustainability objectives. Although the revised policy no longer makes reference to the delivery of Line 1 of the Merseytram network linking Kirkby to Liverpool city centre, it still seeks to improve the choice and use of more sustainable transport modes by ensuring new development is located and designed to prioritise sustainable modes of travel through a choice of walking, cycling and public transport. It is also recognised that irrespective of whether or not a reference is included to it in the policy, the Merseytram is not being progressed.
- 5.140 The revised policy still requires larger scale proposals to be located in the most accessible locations and states that the Council will give priority to schemes that provide for improvements to the rail network, enhanced provision for buses, and the delivery of an enhanced provision of walking and cycling routes as part of the Green Infrastructure network. The amendments made to the policy mean that new development may be less likely to incorporate specific measures to mitigate climate change and improve air quality. However, it is considered that the broader scope of policy interventions retained within the policy still have the potential to support a positive shift to more sustainable modes of transport with a moderate degree of certainty. It is therefore considered that the revised policy could still have a major positive effect on the objectives relating to mitigating climate change and improving the choice and use of more sustainable transport modes; and some positive impact on the objective of protecting air quality.
- 5.141 The amended policy still seeks to ensure that the Borough has a sustainable transport system that enables people to get to where they need to go by walking, cycling and public transport. It also requires new development to be located and designed to promote accessibility and stipulates that larger scale proposals (which would include major employment-led developments and health and education facilities) should be located in the most accessible locations. The policy also still provides support for strategic transport schemes that would improve access to major employment locations, such as Liverpool City Centre, Liverpool John Lennon Airport and the Port of Liverpool. It is therefore considered that the revised policy would continue to have a major positive effect on the objective relating to poverty and deprivation; and a positive effect on the objectives of improving access to services and facilities; reducing unemployment; reducing health inequalities; and improving educational attainment and opportunities for lifelong learning. It is also considered that the policy would have a positive effect on the

objectives relating to the competitiveness of businesses in Knowsley by facilitating the efficient movement of people and goods within the Borough. Furthermore, the requirement for new development to comply with maximum parking standards should reduce the amount of land that is required for parking and therefore have a positive effect on the objective of protecting land and soil quality.

- 5.142 There are no anticipated negative or uncertain effects on the sustainability objectives and, as such, no mitigation measures are proposed.

CS8: Green Infrastructure

- 5.143 It is envisaged that the proposed modifications to the policy would have no significant impact on its performance in the sustainability appraisal process. The proposed amendments would ensure that the policy provides additional protection for designated wildlife sites and would also ensure that there is necessary mitigation and / or compensation for Green Infrastructure or biodiversity loss. This would have a positive impact on the performance of the policy against the objectives that relate to biodiversity; and green infrastructure. Nevertheless, the assessment of the version of the policy included in the submission version of the Core Strategy considered that there was already a high level of certainty that is policy would have a major positive impact on these objectives and, as a result, the proposed modification would not significantly improve the performance of the policy in the sustainability appraisal process.

- 5.144 The amended policy would still have a major positive impact on the objective of protecting and enhancing landscape character, and some positive effect on the objectives relating to protecting and restoring land and soil quality; and built heritage. The revised policy also still states that planning powers will be used to, amongst other things, deliver new integrated and functional Green Infrastructure that provides mitigation and adaptation to climate change, such as sustainable drainage systems, carbon capture and storage, and green roofs. It is therefore envisaged that the amended policy would continue to have a major positive effect on the objective relating to mitigating climate change and its sub-objective of minimising flood risk. The delivery of green roofs and Green Infrastructure that contributes to carbon capture and storage should make a positive contribution to reducing carbon emissions. In addition, the provision of green paths and cycle ways could encourage walking and cycling as an alternative to travelling by car. It is therefore considered that the amended policy would also continue to have a positive effect on the objectives relating to mitigating climate change; air quality; and the use of more sustainable transport modes.

- 5.145 By seeking to protect and maintain Green Infrastructure that provides opportunities for sport and recreation the policy could help provide

opportunities for participation in sport and recreation which would have a positive effect on the objectives relating to health; and poverty and social deprivation. It is however recognised that the provision of opportunities for sport and recreation does not necessarily guarantee engagement in these activities and, as a result, there is only a low level of certainty about the effect on these objectives. The provision of an enhanced Green Infrastructure network within the Borough may increase the desirability of Knowsley as a destination for investment which would have a positive effect on the objectives relating to poverty and deprivation; business competitiveness; and high and stable levels of employment. It is however acknowledged that there is only a low level of certainty about this impact as it is recognised that a large range of factors influence the investment decisions of businesses.

- 5.146 It is anticipated that the amended policy would have no negative or uncertain effects on the sustainability objectives.

CS10: Principal Regeneration Area – Kirkby Town Centre

- 5.147 It is envisaged that the proposed modifications to the policy would have a relatively limited impact on the performance of the policy in the sustainability appraisal process. Although the revised policy no longer makes reference to the delivery of Line 1 of the Merseytram network linking Kirkby to Liverpool city centre, it would still deliver improved facilities for sustainable transport, including improvements to Kirkby bus station and public transport interchange facilities, and the creation of new footpaths and cycleways. It is therefore considered that the revised policy could still improve access to the town centre and secure some modal shift to more sustainable modes of transport. As a result, it is considered that the amended policy would continue to have a positive impact on the objectives that relate to access to services and amenities; air quality; and improving the choice and use of more sustainable transport modes.

- 5.148 The amended policy would still result in the provision of a wide range of uses in Kirkby town centre, including comparison and convenience retail floorspace, key services, leisure facilities and enhancements to the evening economy. It also continues to provide support for the expansion of the town centre on land south of Cherryfield Drive, although this is only as an alternative to existing commitments to ensure there is sufficient capacity for retail-led regeneration. The revised policy also emphasises that this expansion would have to be justified against the tests of policy CS4 which increases the level of certainty that any expansion at Cherryfield Drive would be well-integrated with the existing town centre and would compliment, rather than compete with, the existing centre. As such, the proposed modifications increase the level of certainty that the policy would have a major positive effect on the objectives relating to the enhancing the vitality and viability of town centres.

- 5.149 The proposed modifications to the policy would not affect the performance of the policy against any of the other sustainability objectives. The revised policy would continue to have a positive impact on the objectives that relate to poverty and deprivation; increasing the number of new businesses; and reducing unemployment. By encouraging the redevelopment of some previously developed sites around the town centre it could also reduce the need to release greenfield sites for development and thereby have a positive effect on the objective relating to protecting land and soil. It is also considered that the amended policy would continue to have a positive effect on the objectives relating to health; crime; and educational attainment but it is acknowledged that there is only a low level of certainty that the policy would have a positive effect on these objectives.
- 5.150 It is anticipated that the amended policy would have no negative effects on the sustainability objectives. It is however considered that the revised policy would continue to have an uncertain effect on the objective relating to mitigating climate change as it is considered to be uncertain whether the increase in carbon emissions arising from the built development would be outweighed by the mitigation measures built into the policy.

CS11: Principal Regeneration Area – Knowsley Industrial and Business Parks

- 5.151 The proposed modifications to the policy would not have a significant impact on its performance in the sustainability appraisal process. The appraisal of the version of the policy included in the Local Plan: Core Strategy Submission document concluded that the policy would have an uncertain impact on the objective that relates to the vitality and viability of Knowsley's town and local centres as it could lead to a significant amount of town centre uses (B1 office) taking place in Knowsley Industrial and Business Parks which is an out of centre location. The revised policy would still direct B1 office development to this location. However, the amended policy wording is now unequivocal that any B1 office development will be subject to sequential testing. As a result, it is considered that the revised policy would help protect the vitality and viability of Knowsley's town and local centres and would therefore now have a positive impact on this objective.
- 5.152 The proposed modifications to the policy could increase the number of storage and distribution uses to the south of South Boundary Road which could generate a significant number of vehicle movements and impact on the objectives that relate to air quality and sustainable transport. Nevertheless, there is limited information available on the amount and nature of the new employment development that would be delivered. In addition, it is recognised that the revised policy still incorporates measures to reduce car use, such as improved public

transport interchange facilities and the creation of new footpaths and cycleways, and provides support for the potential growth of Knowsley Rail Freight Terminal. As such, it is considered that the revised policy would still have an uncertain impact on these objectives.

- 5.153 The amended policy would still lead to development being directed to an area which comprises principally of previously developed land which would reduce the requirement to release greenfield sites to meet the Borough's need for employment land. In addition, by encouraging investment in the Parks it could lead to the remediation of contaminated and derelict/underused sites within them. As a result, the policy could have a positive impact on the objectives. However, the revised policy still supports the development of a gateway location which is a greenfield site that is partly within the Green Belt. Modifications to other policies in the Plan mean that this site is now unlikely to be subject to phasing restrictions and, as such, it could come forward at any point during the plan period. Consequently, the revised Policy CS11 is now considered to have an uncertain impact on the objective.
- 5.154 The proposed modifications to the policy would not affect the performance of the policy against any of the other sustainability objectives. The policy would still promote a mix of new employment development in a location that is accessible from areas of deprivation and would introduce measures to improve the accessibility of the parks from Kirkby. The amended policy would therefore still have a major positive effect on the objectives relating to poverty and deprivation; the growth potential of businesses; and levels of employment and long term unemployment. It is anticipated that the significance of the positive effect on each of these objectives will increase as the Plan's proposals take effect. The revised policy would also still result in Green Infrastructure enhancements to Knowsley Industrial and Business Parks and have a positive effect on the objectives relating to biodiversity and Green Infrastructure.
- 5.155 The modifications to the policy would not impact upon the likelihood of the policy creating new jobs and access to job-based training. It is therefore considered that the revised policy still has the potential to have a positive effect on the objective relating to access to education, training and opportunities for lifelong learning. The revised policy would also still have a positive effect on the objective that relates to health and an uncertain impact on the objectives that relate to protecting the local character of the landscape; and mitigating climate change.

CS14: Principal Regeneration Area – Prescott Town Centre

- 5.156 The proposed modifications to the policy would not have a significant impact on its performance in the sustainability appraisal process. The revised policy would still direct investment to Prescott town centre and

would seek to intensify its retail function, encourage a wider mix of uses and create a distinctive identity and a complimentary evening economy. As such, the revised policy would still have the potential to have a major positive impact on the objective that relates to the vitality and viability of Knowsley's town and local centres. The amended policy wording does however remove some of the restrictions placed on retail development in Cables Retail Park. In particular, it is no longer specified that retail development within Cables Retail Park should provide for convenience or bulky goods retailing and should maintain the current retail floorspace capacity of the Retail Park. These amendments could increase the scope for further investment in the Retail Park and result in a consequential reduction in investment in Prescott town centre, particularly as the Knowsley Local Plan Economic Viability Assessment (2012) indicates that comparison retail in Prescott town centre is generally unviable in current market conditions. This reduces the level of certainty that the revised policy would have a positive effect on the objective.

5.157 By reducing the level of certainty that the policy would support investment in Prescott town centre, these proposed amendments mean that there is also a lower level of certainty that the revised policy would have a major positive impact on the objective that relates to protecting and enhancing Knowsley's built heritage.

5.158 The proposed modifications to the policy would not affect the performance of the policy against any of the other sustainability objectives. The policy would continue to encourage the provision of employment and retail uses in Prescott town centre and could therefore have a positive effect on the objective of increasing the number of new businesses and its sub-objective of increasing commercial floorspace. By promoting the provision of a mix of uses in Prescott town centre the revised policy would still have the potential to create a number of employment opportunities and improve access to services and facilities, particularly as Prescott town centre is accessible by a choice of modes of transport. It is therefore envisaged that the revised policy would continue to have a positive effect on the objectives relating to poverty and social exclusion; community severance; health; educational attainment; and levels of employment. It is however recognised that there is only a low level of certainty that the policy would have a positive effect on the objectives relating to health and educational attainment as it only indicates a willingness to accommodate these uses in the town centre rather than proposing to provide them. The provision of a mix of uses in Prescott town centre should also help people to meet their needs locally and could thereby have a positive effect on the objectives relating to air quality and reducing the need to travel.

5.159 There are no anticipated negative effects on the sustainability objectives. The proposed modifications would not however prevent the policy from having an uncertain impact on the objective relating to mitigating climate change.

CS15: Delivering Affordable Housing

5.160 The proposed modifications to the policy would not have a significant impact on its performance in the sustainability appraisal process.

5.161 The Strategic Housing Market Assessment (SHMA) and its 2013 update report identified a need to provide over 5,000 affordable housing units over a ten-year period in order to fully meet the outstanding and arising need for affordable housing in Knowsley. Although the revised policy would still require 25% of new dwellings on Sustainable Urban Extensions to be affordable housing, it would reduce the equivalent figure for sites in the urban area to 10%. This reduction in the affordable housing target means that the policy is unlikely to provide the number of affordable housing units identified by the SHMA as being required.

5.162 Nevertheless, the Economic Viability Assessment for Knowsley (2012) has demonstrated that pursuing a higher percentage may impact on the viability of residential development in certain parts of the Borough, which may risk market housing delivery overall. Consequently, by adopting an approach where a higher contribution towards affordable housing is only sought on the Sustainable Urban Extensions, which the Economic Viability Assessment indicates are likely to be able to achieve this level of affordable housing provision, the revised policy should ensure that contributions to affordable housing are maximised without adversely affecting housing delivery elsewhere in the borough. It is recognised that further reducing the affordable housing target further to, for example, 5% on sites in the urban area would ensure that a very significant proportion of new development would be able to meet this target. Nevertheless, such an approach is likely to result in a very significant reduction to investment in affordable housing in urban areas. On this basis, although the adoption of the 10% and 25% figures in the revised policy would mean that only a proportion of the overall identified need is addressed, the adoption of these targets would help the policy to secure the maximum achievable delivery of affordable housing units relative to identified needs. In addition, the original modifications to the policy proposed in June 2014 provide greater flexibility for affordable housing provision in relation to, for example, the tenure split between affordable rent and intermediate housing and the delivery of affordable housing in partnership with registered providers. The proposed further modifications to the policy would provide additional flexibility in relation to the tenure mix of housing to be provided. It is therefore considered that the proposed further

modifications to the policy would help to ensure that contributions to affordable housing are maximised.

- 5.163 As a result, it is considered that the policy would continue to have a positive impact on the objective that relates to the provision of good quality, affordable housing. In addition, as the provision of well-designed, affordable housing can make a significant contribution towards health and can also ensure that the Borough attracts an adequate workforce to support its economy, it is considered that the amended policy would continue to have a positive impact on the objectives of reducing poverty and social deprivation; improving health and reducing health inequalities; and improving the competitiveness of business and increasing the number of new businesses.
- 5.164 The revised policy would also still require new affordable housing to comply with the design standards set out in policy CS17. Nevertheless, Policy CS17 has itself been amended so that it no longer requires new housing to be built to higher Code for Sustainable Homes standards than Building Regulations. As a result, it is now considered that the policy would be unlikely to have a significant impact on the objectives relating to mitigating climate change; using water and mineral resources prudently; and minimising the production of waste and increasing reuse, recycling and recovery rates.
- 5.165 It is anticipated that the revised policy would not have a negative or uncertain effect on any of the sustainability objectives.

CS17: Housing Sizes and Design Standards

- 5.166 The proposed modifications to the policy would have a number of impacts on its performance in the sustainability appraisal process. In particular, the amended policy no longer requires new housing to be built to higher Code for Sustainable Homes standards than Building Regulations. As a result, the revised policy is unlikely to achieve a significant proportion of new housing in Knowsley being built to high standards of energy efficiency. It is also less likely to result in new housing incorporating appropriate renewable energy technologies and water conservation measures or using recycled materials. As such, the proposed modifications mean that the policy is unlikely to still have a positive impact on the objectives that relate to mitigating climate change; minimising the production of waste and increasing recycling rates; and ensuring the prudent use of water and mineral resources. The revised policy is instead unlikely to have any significant impact on these objectives.
- 5.167 In addition, by encouraging, rather than requiring, new housing to be built to higher Code for Sustainable Homes standards than Building Regulations, there is also a reduced level of certainty that the policy

would have a positive impact on the objectives that relates to poverty and deprivation; and health.

- 5.168 The revised policy would however still help to ensure that new developments provide a mix of housing which helps to meet local needs and contributes to the re-balancing of the housing market. In addition, by only encouraging, rather than requiring, developments to achieve certain standards there is a reduced likelihood that the policy could have a negative impact on the viability of housing development in the borough. As such, it is envisaged that the revised policy would continue to have a major positive effect on the objective relating to the provision of good quality housing and its sub-objective relating to providing a wider choice of accommodation.
- 5.169 By supporting the provision of a greater mix of housing which could help attract high paying employers and their employees to the area, the revised policy would also continue to have some positive effect on the objectives relating to increasing the number of new businesses; enhancing the vitality and viability of Knowsley's town centres; and maintaining high and stable levels of employment.
- 5.170 The revised policy would not have a negative or uncertain effect on any of the sustainability objectives.

CS18: Accommodation for Gypsies and Travellers and Travelling Showpeople

- 5.171 The proposed modifications would not have a significant impact on the performance of the policy in the sustainability appraisal process. The modifications to the policy do however specify that the target for accommodation to be provided, including appropriate five year requirements, and the location of any site(s) required to meet the target will be identified in the Local Plan: Site Allocations and Development Policies. This increase the likelihood of the accommodation being provided and, as such, it is considered that the revised policy has the potential to have some positive impact on the objective that relates to the provision of a choice of housing. Nevertheless, it is recognised that irrespective of whether or not a reference is included to it in the policy, national planning guidance contained within the Planning Policy for Traveller Sites requires local planning authorities to use their Local Plans to set pitch targets for gypsies and travellers and plot targets for travelling showpeople. This guidance also states that local planning authorities should use their Local Plans to identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets. As such, it is considered that there is only a low level of certainty that the proposed modification would have a significant impact on the objective.



5.172 The proposed modifications would have no other impacts on the performance of the policy against the sustainability objectives and the revised policy would still have a positive effect on a range of social, environmental and economic objectives. The amended policy still seeks to ensure that sites for accommodation for Gypsies, Travellers or Travelling Showpeople have ease of access to local centres, health facilities, education facilities and public transport nodes. The revised policy also still requires sites to have a sufficient level of supporting physical infrastructure, including ensuring it can be served by adequate electricity, water, sewerage and other utilities connections. It is therefore envisaged that the amended policy would continue to have a major positive effect on the objective relating to health and a positive effect on the objectives relating to poverty and deprivation; accessibility of goods, services and amenities; education; air quality; reducing the need to travel; and levels of employment. The requirement for sites for accommodation for Gypsies, Travellers or Travelling Showpeople to have ease of access to local centres may increase levels of expenditure in these centres and thereby have a positive effect on the objective relating to the vitality and viability of Knowsley's town centres. It is however noted that the Merseyside Gypsy and Traveller Accommodation Needs Assessment (2008) indicated that only a relatively small number of pitches are required in Knowsley and, as a result, there is only a low level of certainty whether the additional expenditure generated would have a significant impact on this objective.

5.173 The amended policy still specifically states that flood risk will be taken into account when considering the suitability of sites for accommodation for Gypsies, Travellers or Travelling Showpeople. It is therefore considered that the revised policy should still have a positive effect on the objective of adapting to climate change, including flood risk. It would also still ensure that sites for accommodation for Gypsies, Travellers or Travelling Showpeople maintain or improve local environmental quality, including landscape character, and have suitable physical environmental conditions, including ground conditions. It should therefore have a positive effect on the objectives of protecting land and soil quality and protecting and enhancing the local character and accessibility of the landscape.

5.174 There are no negative or uncertain effects on the sustainability objectives.

CS20: Managing the Borough's Historic Environment

5.175 It is envisaged that the proposed modifications to the policy would have no significant impact on its performance in the sustainability appraisal process. The proposed amendments would provide some additional scope for the demolition of historic assets where it can be demonstrated that there are substantial public benefits which clearly



outweigh the harm or loss. Nevertheless, the revised policy would still support the preservation and enhancement of the Borough's historic assets and would encourage the sympathetic reuse of vacant and underused historic assets. It is therefore considered that the revised policy would continue to have a major positive impact on the objective of preserving, enhancing and managing Knowsley's rich diversity of cultural, historic and archaeological buildings, areas, sites and features.

5.176 The amended policy would still encourage the preservation and enhancement of the Borough's heritage assets, including sites included on the English Heritage Register of Parks and Gardens. Accordingly, the protection afforded by the policy to parts of Knowsley Hall Park and Croxteth Park should ensure that the revised policy still has a positive effect on the objectives of protecting the local character and accessibility of the landscape and conserving and maintaining green infrastructure.

5.177 The revised policy also still encourages the re-use of vacant and underused historic assets and states that favourable consideration will be given to schemes that enhance the importance of the asset for the economy. The policy could thereby result in the creation of premises for new businesses. In addition, protecting and enhancing buildings and features of historic interest should help create more attractive places to invest in and could lead to enhancements to Prescott town centre. Consequently, the amended policy would also continue to have the potential to have a positive effect on the objectives relating to poverty and deprivation; increasing the number of new businesses; enhancing the vitality and viability of town and local centres; and maintaining high and stable levels of employment and reducing long-term unemployment.

5.178 It is anticipated that the revised policy would not have a negative or uncertain effect on any of the sustainability objectives.

CS21: Greenspaces and Trees

5.179 The proposed modifications to the policy would have some impact on the performance of the policy against a number of sustainability objectives. In particular, although the revised policy still seeks to resist new development which would result in the loss of greenspace and would provide support for the provision of new areas of greenspace, the modifications to the policy mean that it would now encourage the retention of existing trees and woodlands and the appropriate planting of new trees rather than require this. This amendment to the policy wording is considered to reduce the level of certainty that existing trees would be retained and new planting secured. Consequently, whilst it is considered that other aspects of the policy would ensure that it continues to have a major positive impact on the objectives that relate to landscape character and green infrastructure; and a positive impact

on the objectives that are concerned with adapting to climate change; mitigating climate change; water quality; and air quality; it is considered that this modification results in only moderate certainty that the policy would have a positive effect on these objectives.

- 5.180 The proposed modifications to the policy would not affect the performance of the policy against any of the other sustainability objectives. The policy would still encourage the provision of new areas of greenspace which conserve natural features, wildlife and fauna and would have a major positive effect on the objective relating to biodiversity. It will also still ensure that there is an adequate supply of accessible, high quality greenspaces. By increasing the attractiveness of the Borough as a place to live and invest, this could have a positive effect on the objective relating to increasing the number of new businesses. The stipulation that greenspaces should be safe and secure for all members of the community to use should also ensure that the policy has a positive effect on the objective relating to reducing crime, disorder and fear of crime.
- 5.181 The revised policy would still seek to resist the loss of greenspace and would provide support for the improvement of existing public open spaces and encourage the provision of new greenspaces. It could therefore help provide opportunities for participation in sport and recreation which would have a positive effect on the objectives relating to health; and poverty and social deprivation. It is however recognised that the provision of opportunities for sport and recreation does not necessarily guarantee engagement in these activities and, as a result, there is only a low level of certainty about the effect on these objectives.
- 5.182 It is anticipated that the revised policy would not have a negative or uncertain effect on any of the sustainability objectives.

CS22: Sustainable and Low Carbon Development

- 5.183 It is envisaged that the proposed modifications to the policy for Sustainable and Low Carbon Development would have a number of impacts on its performance in the sustainability appraisal process. The amended policy still requires development to incorporate a range of measures which would improve its sustainability. Nevertheless, the removal of the requirement for new development to achieve particular Code for Sustainable Homes/BREEAM standards and the removal of the requirement for development to incorporate decentralised and low carbon energy, means that there is a lower level of certainty that the policy would have a major positive effect on the objective that relates to mitigating climate change. Similarly, by not requiring new development to achieve particular Code for Sustainable Homes/BREEAM standards it is considered that the policy is less likely to result in new developments which incorporate water conservation measures or make

use of recycled materials. As such, the proposed modifications mean that there is a lower level of certainty that the policy would have a positive impact on the objectives that relate to minimising the production of waste and increasing recycling rates; and ensuring the prudent use of water and mineral resources.

- 5.184 In addition, the removal of the requirement to achieve certain Code for Sustainable Homes standards mean there is also a reduced level of certainty that the policy would have a positive impact on the objectives that relates to poverty and deprivation; and health.
- 5.185 The amended policy would still require new development to incorporate high standards of insulation and achieve higher standards of sustainability. In addition, the removal of the requirement to comply with Code for Sustainable Homes/BREEAM standards also reduces the likelihood that the policy could have a negative impact on the viability of new development in the borough. As a result, it is considered that the amended policy would still have a positive impact on the objectives that relate to the provision of good quality housing; and increasing the competitiveness and number of new businesses.
- 5.186 The proposed modifications would have no significant impact on the performance of the policy against any of the other sustainability objectives. In particular, by still encouraging the use of Sustainable Drainage Systems, landscaping and green roofs/walls should ensure that the revised policy still has a positive effect on the objectives relating to biodiversity; Green Infrastructure; and water quality.
- 5.187 The revised policy would not have a negative or uncertain effect on any of the sustainability objectives.

CS27: Planning for and Paying for New Infrastructure

- 5.188 As with the version of the policy that was included in the Core Strategy Submission document, the amended Policy CS27 has the potential to have a positive effect on a number of sustainability objectives. Although the proposed further modifications to the policy would mean that new development would no longer have to demonstrate compliance with the Knowsley Infrastructure Delivery Plan and would instead just need to have regard to it, the revised policy would still seek to secure contributions towards the provision of new, and improvement of existing, physical, social, green and digital infrastructure, where appropriate. As a result, it is envisaged that the policy has the potential to have a positive effect on a wide range of sustainability objectives, including those that relate to poverty and deprivation; community severance; health; educational attainment; built heritage; landscape character and accessibility; biodiversity and geodiversity; adapting to climate change; mitigating climate change; Green Infrastructure; water quality; waste; the vitality and viability of centres; and unemployment.

- 5.189 As with the version of the policy that was included in the Core Strategy Submission document, the amended policy continues to make an allowance for the impact of the contributions sought on the viability of development. Whilst this will help to ensure that the impact of contributions on economic viability and the risk this brings to new development is accounted for within planning decisions (in accordance with national policy), it gives a reduced level of certainty about the contributions to infrastructure that would be secured, particularly as the Knowsley Economic Viability Assessment (2012) highlights that viability may be an issue for residential development in certain parts of the Borough and for many forms of non-residential development across the Borough. As a result, there is only a low level of certainty that the policy would have a significant impact on many of the objectives, although it is recognised that the viability of developments may improve over time as economic conditions improve.
- 5.190 The initial modifications proposed to the policy in June 2014 provide clarity about which forms of infrastructure would be prioritised where development viability is challenging. The first priority would be to deliver the requirements which are necessary to make development acceptable in planning and safety terms, and these can be considered effectively “non-negotiable” requirements. This can include access works, and works which prevent or mitigate the risk of flooding where this is relevant. As a result in this latter circumstance, the modifications made to the submission version of the policy increase the level of certainty that the policy would have a positive impact on the objective of adapting to climate change. Following this, the revised policy does however also prioritise local priorities which are impacted by new development – for example, the provision of greenspace in areas of deficit, where economic viability impacts on the contributions that can be provided for new residential development. This increases the likelihood of greenspace being provided and therefore increases the level of certainty that the policy would have a positive impact on the objectives that relate to green infrastructure; biodiversity; the character and accessibility of the landscape; health; and poverty and social deprivation.
- 5.191 The appraisal of the version of the policy that was included in the Core Strategy Submission document concluded that the policy would have an uncertain impact on the objectives that relate to the delivery of housing and affordable housing; and the competitiveness of businesses due to the potential impacts of the policy on viability. The policy has since been amended to clarify that only “essential” contributions to make the development acceptable in planning/safety terms will be sought when compliance with the policy would adversely affect the viability of a development. Additional contributions will be considered within individual planning decisions, with reference to detailed viability

evidence. As such, the revised policy should help ensure that the contributions sought do not result in development being unviable and, as a result, the amended policy is now considered to have the potential to have a positive impact on these objectives.

5.192 It is not envisaged that the amended policy would have a negative effect on any of the sustainability objectives.

6. CONCLUSIONS

- 6.1 Urban Vision Partnership Ltd was commissioned by Knowsley MBC to undertake a Sustainability Appraisal of the proposed modifications to the Local Plan: Core Strategy. The appraisal work has been informed by national guidance, best practice and the methodology proposed by the Council in their Scoping Report.
- 6.2 The SA process involved assessing the both the modifications that were proposed to the Plan following the initial Examination hearing sessions in November 2013 and also the further modifications proposed by the Council after the reconvened hearings in July 2014 in order to consider whether these modifications have the potential to result in significant effects on sustainability objectives and, as a result, merit further consideration through the SA.
- 6.3 This assessment identified that in the majority of instances, the proposed modifications and proposed further modifications would not significantly alter the intent of the Plan. Accordingly, many of the modifications are unlikely to have a significant material impact on the performance of the Plan in the SA process and do not therefore merit further appraisal. Nevertheless, the assessment of the modifications did identify a number of modifications that could be 'significant' in SA terms.
- 6.4 These modifications have been appraised using the methodology set out in the Local Plan: Core Strategy SA Scoping Report and the SA Report of the Proposed Submission version of the Plan. This involved the consideration of the degree and type of impact, split by short term (0-5 years), medium term (5-10 years), and long-term (10+ years). It also predicted the certainty of impact (in terms of high, medium and low); the scale of impact (which ranged from local to national); the permanence of the impact; any key secondary, cumulative and/or synergistic impacts; and options for mitigation.
- 6.5 The appraisal of the modifications to the plan included an assessment of four strategic options in relation to the allocation of Sustainable Urban Extensions (SUEs). This appraisal has demonstrated that although each of these options would have a similar impact on the majority of the sustainability objectives, converting all of the 'reserved' locations to SUE site allocations and allowing development early in the Plan period (Option 1) would provide a greater level of certainty that these sites would come forward and therefore increase the likelihood of there being a positive impact on a number of objectives, particularly in the early part of the Plan period.
- 6.6 An appraisal has also been undertaken of a number of new policies that have been developed to support the development of these SUEs.

Taken as a whole, the appraisals have indicated that these policies are likely to support the delivery of new housing and employment development and could therefore support the objectives that relate to providing good quality housing; improving the competitiveness of business and increasing the number of new businesses; and reducing unemployment. However, as these policies would support the release of a number of predominantly greenfield sites in the Green Belt, these policies would, on the whole, have the potential to have a negative or uncertain impact on the objectives that relate to landscape character; green infrastructure; and protecting land and soil. This appraisal has taken into account the further modifications to these policies which have been proposed following the reconvened hearings in July 2014. This has demonstrated that the further modifications would not significantly alter the performance of the policies in the SA process.

- 6.7 The appraisal of the options in relation to the delivery of individual SUEs highlighted that each of the site specific options would have a range of positive and negative impacts. It also highlighted that in a number of instances the key differences between the options related to the degree of certainty that an impact would take place and the timeframes over which it would occur. Appendix H provides a matrix that summarises the performance of each of the options for the individual SUEs.
- 6.8 An appraisal has also been undertaken of two alternative sites. The first of these, Land at Lydiate Lane, is a re-appraisal of the site which was appraised earlier in the Plan preparation process. This appraisal considered the implications of a proposed amendment to the boundary of this site. It concluded that the revisions to the site boundary would reduce the extent to which the potential development of the site would have a negative impact on certain environmental objectives. Nevertheless, the appraisal also considered that the modifications reduced the extent to which it would have a positive impact on several social and economic objectives.
- 6.9 The other alternative site that was appraised was Land at Burtons Way. It was concluded that this site has the potential to have a positive impact on some sustainability objectives, including those that relate to providing good quality housing; improving the accessibility of goods and services; reducing the need to travel; and enhancing the vitality and viability of Knowsley's town and local centres. Nevertheless, due to the relatively limited capacity of the location, the SA considered that the potential development of the Land at Burtons Way would not have a significant impact on many of the objectives. In addition, the appraisal process has also highlighted that the proposed use of the site for housing could have a negative or uncertain impact on several sustainability objectives.

- 6.10 The appraisal of the modifications to the Core Strategy policies concluded that, in many instances, the proposed alterations would not significantly alter the performance of the policies in the SA process. This is demonstrated in Appendix H which provides a matrix that summarises the performance of each of these amended policies in the SA process in comparison to the version of the policies that was included in the Core Strategy: Local Plan Submission document. There are however a number of instances where the modifications to the policies change the level of certainty that an impact will occur. In addition, a number of the amendments alter the timeframe over which an impact will occur. Policies CS15 and CS27 have been re-appraised to take into account the proposed further modifications to this policy. This re-appraisal concluded that the proposed further modifications would not significantly alter the performance of the policies in the SA process.