

KNOWSLEY LOCAL PLAN: CORE STRATEGY

KNOWSLEY METROPOLITAN BOROUGH COUNCIL

HEARING STATEMENT 1

Matter 1 LEGAL COMPLIANCE AND PROCEDURAL MATTERS

Issue: Whether the plan complies with the legal requirements of the 2004 Act and the 2012 Regulations.

Questions

1.1 In preparing the Knowsley Local Plan: Core Strategy (KLPCS), has the Council fulfilled the 'duty to co-operate' requirements of section 33A of the Planning and Compulsory Purchase Act 2004?

1.1.1 Section 33A of the Planning and Compulsory Purchase Act requires the Council to *".....engage constructively, actively and in an on-going basis....."* with other local planning authorities and other public bodies when preparing development plan documents.

1.1.2 The Council's Duty to Cooperate Statement (SD14) sets out how it has complied with the duty. The approach has been informed by the close linkages which exist between Knowsley and the wider Liverpool City Region for example in terms of the housing market, travel to work areas, infrastructure, retail, culture and leisure.

1.1.3 The Duty to Cooperate Statement identifies 16 strategic matters on which the Council has co-operated with other bodies, including (for each matter):

- The reason why the duty to cooperate is triggered;
- With which bodies the duty is triggered;
- How the co-operation has been carried out;
- What have been the outcomes of the co-operation; and
- How the KLPCS impacts on neighbouring authorities in respect of each issue.

1.1.4 The Council has co-operated with other bodies in a number of ways including (amongst others):

- Joint preparation of the Liverpool City Region Housing Strategy, 2007 (PG28);
- Pro-actively engaging with (i.e. not just consulting) "duty to cooperate" bodies and clearly evidencing responses to issues raised by such bodies at each stage of preparation of the KLPCS;
- Pro-actively engaging in the development of neighbouring authorities' Local Plans and supporting evidence base;
- Joint involvement in the infrastructure delivery plan process; and

- Preparation of evidence base studies on a joint basis with various groupings of one or more neighbouring districts e.g. the initial Strategic Housing Land Availability Assessment in 2010 (EB03); the Joint Employment Land and Premises Study (EB07); Knowsley and Sefton Green Belt Study (EB08); Strategic Flood Risk Assessment –Part 1 (EB14); and the Liverpool City Region Housing and Economic Development Evidence Base Overview Study (LC03).
- 1.1.5 Chapter 5 of the Duty to Cooperate Statement (page 10-13, (SD14)) summarises how the Council has met the duty in relation to the issues of housing, employment land, Green Belt release, strategic infrastructure needs, gypsy and traveller site provision and town centres and retailing. An important outcome is that the KLPCS does not rely on any neighbouring district to meet any of Knowsley's future needs for housing or employment development. No neighbouring district has indicated any reliance on Knowsley to meet any of their housing or employment development needs. Responses from neighbouring districts confirming agreement to the Council's approach are included as Appendix 2 of the Duty to Cooperate Statement (SD14).
- 1.1.6 The Liverpool City Region local authorities are preparing a non statutory "spatial priorities framework" which will identify agreed priorities for the City Region concerning housing, the economy, environment and infrastructure. If completed during the examination period this will be made available.
- 1.2 Is the KLPCS in general accordance with the Statement of Community Involvement?**
- 1.2.1 The KLPCS has been prepared in a way which has fully met and at some stages exceeded the consultation requirements set in the Knowsley Statement of Community Involvement or "SCI" (PP15). Details of the extensive programme of community engagement which has been undertaken are set out in the:
- Core Strategy Issues and Options Paper – Report of Consultation, 2010 (SD05);
 - Core Strategy Preferred Options Report – Report of Consultation, 2011 (SD04);
 - Statement of Previous Consultation, November 2012 (SD03); and
 - Statement of Previous Consultation July 2013 (SD01).
- 1.2.2 The consultation was particularly wide ranging at the "Issues and Options" and "Preferred Option" stages. Each of these stages involved: a leafleting campaign; press releases; staffed events in each of Knowsley's township areas; use of the Council website and Facebook; workshops with sub-regional partners; and presentations to the Knowsley Partnership, Area Partnership Boards, groups representing young people and older people, and several Town and Parish Councils. E-mails and letters were used to consult landowners, developers, statutory agencies, environmental and community groups, neighbouring local authorities, and private individuals in

accordance with the Council's Local Plan consultation database. The database has been added to regularly as the Council has developed the KLPCS.

- 1.2.3 The SCI (paragraphs 7.4 to 7.9 and diagram 5 on page 20 (PP15)) sets out the broad stages that the Council had to undertake in preparing the KLPCS. Table 7.1 (page 21) of the SCI identifies the consultation and engagement methods to be used at each stage. These include methods which must be used and other methods (indicated with asterisks) which can be used. Note 2 to table 7.1 specifies that two or more of the "discretionary" methods must be used at each stage of preparing the Core Strategy and that other methods with an "...equivalent level of impact..." may also be used.
- 1.2.4 The Council has used all the "mandatory" methods at each stage in developing the KLPCS.
- 1.2.5 At "Issues and Options" stage in late 2009/early 2010 the Council used all four of the discretionary means of engagement which are specified in the SCI ("leaflet" including a short "questionnaire"; "press article"; and "Knowsley News"). At "Preferred Options" stage in 2011 the Council used three of the discretionary means of engagement which are specified in the SCI (press release; exhibitions/road shows; and the Knowsley News). It therefore satisfied the requirement to use at least two of these specific methods at each of these stages.
- 1.2.6 The Council also used a wide variety of other methods beyond those mentioned in the SCI at each stage (see paragraph 1.2.2 above). Appendix A of the Issues and Options Paper – Report of Consultation (SD05a) and Appendix A of the Core Strategy Preferred Options – Report of Consultation (SD04) explain how each stage met and indeed exceeded the SCI requirements. The period over which consultation took place on the Preferred Options Report (10 weeks) significantly exceeded the 6 weeks stated in the SCI.
- 1.2.7 At Proposed Submission stage in late 2012 the Council used a press release and the Knowsley News and therefore used two of the discretionary methods of engagement for this stage as required by the SCI.
- 1.2.8 The Council has also significantly exceeded the consultation requirements set down in the Town and Country Planning (Local Planning) (England) Regulations 2012, and preceding regulations published in 2004, 2008 and 2009 (LR07-LR10).
- 1.2.9 The consultation methods used by the Council have been influenced by changes to national regulations. For example Regulations 25 and 26 in the 2004 regulations (which are referred to in diagram 5 of the SCI, page 20) have been superseded. The "Issues and Options" and "Preferred Options" stages which accorded with these Regulations fall within the scope of the early engagement now required by Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (LR07).

- 1.2.10 Under the process described in diagram 5 of the SCI the "submission version" of the Plan had to be submitted to the Secretary of State before being published for comment under what was then Regulation 28. This stage has changed because this version of the Plan must first be published for comments (under Regulation 19 of the 2012 Regulations) before being submitted.
- 1.2.11 The SCI (paragraph 7.6, page 18 (PP15)) states that the findings of each stage of the consultation will be reported to the Council's Cabinet. The Council has complied with this requirement at each stage, except in respect of the "Proposed Submission" stage. This is because the order of the publication and submission stages has changed as referred to in paragraph 1.2.10 above. The comments received at "Proposed Submission" stage have however been published in documents SD1 and SD2. Compliance with this procedural change required by the current regulations does not constitute a failure to generally accord with the SCI.
- 1.3 Has the KLPCS emerged from an open and transparent process that demonstrates how and why the preferred strategy was selected, in consultation with the public and other stakeholders?**
- 1.3.1 As described above and in documents SD01, 03, 04, 05, 14, 18 and 19 the Council has undertaken a comprehensive consultation process over several stages in developing the KLPCS. At each stage the Council has made all KLPCS documents, evidence base, supporting documents and other material available for public review. It has also published comprehensive reports of consultation at each stage. The process by which the preferred strategy has developed as a result is set out in the Council's Statement of Previous Consultation, July 2013 (SD01).
- 1.3.2 In 2009, the initial "Issues and Options" document and accompanying consultation leaflet (CS06 and CS07) identified three broad options as follows:
- Option A "Urban Concentration"
 - Option B "Focused Urban Regeneration"
 - Option C "Sustainable Urban Extensions".
- 1.3.3 The Council also invited views on a range of detailed policy options which helped inform the subsequent stages.
- 1.3.4 The Core Strategy Preferred Options Report dated 2011 (CS04) then set out the preferred strategy and 27 preferred policy options. Chapter 4 of this document "Towards a Spatial Strategy" summarises why the preferred strategy was selected based upon an analysis of: the feedback from the consultation on the earlier Issues and Options stage; findings of the sustainability appraisal; the evidence base; and the Knowsley Sustainable Community Strategy.

- 1.3.5 The Preferred Options Report (paragraph 4.26, page 49 (CS04)) concluded that the preferred strategy was to be a mixture of Option B "Focussed Urban Regeneration" and Option C "Sustainable Urban Extensions". This approach still forms the basis for the strategy in the subsequent submission version of the KLPCS (CS01). Each of the preferred policy options was accompanied by a "policy progression" box which described how the results of the earlier consultation had been taken into account.
- 1.3.6 In developing the "proposed submission" version of the KLPCS in 2012 the Council considered in detail the feedback from the consultation on the Preferred Options Report alongside other factors such as national policy, the evidence base and sustainability and other appraisals. The ways in which this process influenced this stage of the KLPCS are set out in "Accounting for Assessments" (SD16) and "Accounting for Preferred Options Consultation"(SD17).
- 1.4 Has the KLPCS been the subject of suitably comprehensive and satisfactory Sustainability Appraisal, Strategic Environmental Assessment and Appropriate Assessment under the Habitats Regulations?**
- 1.4.1 The KLPCS has been subject to a comprehensive process of Sustainability Appraisal which has incorporated a Strategic Environmental Assessment. This process has been carried out by specialist consultants in accordance with relevant legislation including Section 19(5) of the Planning and Compulsory Purchase Act 2004 (LR01) and European Union Directive 2001/42/EC.
- 1.4.2 An initial scoping report (see document SD10b) was prepared in consultation with statutory consultees in 2009. This established the key sustainability issues to be addressed in the Knowsley Local Plan.
- 1.4.3 The Sustainability Appraisal has subsequently been undertaken over a number of stages, which are documented as follows:
- Interim Sustainability Appraisal – Core Strategy Issues and Options Paper, 2009 (SD10)
 - Interim Sustainability Appraisal – Core Strategy Preferred Options Report, 2011 (SD09)
 - Sustainability Appraisal – Green Belt Locations, 2012 (SD08)
 - Core Strategy Sustainability Appraisal, 2012 (SD07).
- 1.4.4 All Sustainability Appraisal and Habitat Regulation Assessment documents, together with Health Impact and Equalities Impact Assessments have been made available for comments with other public consultation materials at each stage of development of the KLPCS.
- 1.4.5 The findings of each stage of the SA/SEA process have been used to inform the subsequent stages of the KLPCS. Evidence of this is provided for example in Table 4.6 of the Preferred Options Report (CS04), the "policy

- progression" boxes which accompanied each policy in the Preferred Options Report (CS04) and the "Accounting for Assessments" document (SD16) which was used to inform the "proposed submission" version of the KLPCS in 2012. The "Sustainability Appraisal – Green Belt Locations", 2012 (SD08) informed the choice of sites to be removed from the Green Belt.
- 1.4.6 No statutory bodies have any outstanding representations concerning the sustainability appraisal documents or processes.
- 1.4.7 A comprehensive Appropriate Assessment has been carried out in accordance with the Conservation of Habitats and Species Regulations 2010 as amended. This legislation requires the Council to assess the impact of emerging plans on Special Protection Areas (SPA), Special Areas of Conservation (SAC), and sites which are on a draft list for protection together with land that is identified as supporting habitat. Knowsley does not contain any such sites although there are several in the surrounding districts and Knowsley does contain supporting habitat.
- 1.4.8 The documents (titled as "Habitats Regulations Assessments") were prepared by consultants and published at Preferred Options stage in 2011 (SD11a) and proposed submission stage in 2012 (SD12). The Habitats Regulations Assessment findings at Preferred Options stage were used to inform the subsequent publication stage of the KLPCS as described in the "Accounting for Assessments" document (SD16).
- 1.4.9 Section 61 (3) of the Conservation of Habitats and Species Regulations 2010 requires the Council to consult the "... *appropriate nature conservation body*..." for the purposes of the assessment. This is in addition to the more general consultation requirements set out in the planning legislation.
- 1.4.10 The Council has consulted Natural England (the "appropriate nature conservation body" for England) at all stages of preparing the KLPCS. Natural England considers the KLPCS to be sound and legally compliant (see representation 11/1011.1/GEN/LC).
- 1.4.11 Three of the "European sites" which are potentially affected by the KLPCS straddle the border between England and Wales. These include River Dee and Bala Lake SAC, the Dee Estuary Ramsar/SPA/SAC and the Liverpool Bay SPA. The Council has therefore also consulted the "appropriate nature conservation body" for Wales, which is Countryside Council for Wales (CCW) (since 1 April 2013 this is now Natural Resources Wales).
- 1.4.12 CCW submitted detailed comments on the HRA as detailed on page 912 of the Report of Representations Made (SD02). These do not in the Council's view fundamentally challenge the robustness of the HRA or its conclusions with regard to the three "European Sites" which fall partly in Wales. The specialist consultancy which prepared the HRA on behalf of the Council has responded to the comments made by CCW as set out in Appendix 1 to this statement. As stated above Natural England (which is also a statutory nature conservation body for these three sites) has not raised any concerns.

1.5 Are there satisfactory linkages with the Sustainable Community Strategy?

1.5.1 The vision of the current Knowsley Sustainable Community Strategy (SCS) "A Strategy for Knowsley: The Borough of Choice 2012-2023" (PG31) states that by 2023 Knowsley will have:

- *Attractive, sustainable neighbourhoods with a wide choice of housing and excellent community facilities*
- *Vibrant and welcoming town centres*
- *Residents and local communities who are able to make positive lifestyle choices*
- *High quality employment areas which help to drive economic growth in the Liverpool City Region*
- *Narrowed the gap in deprivation levels both between different parts of the Borough and between Knowsley and elsewhere.*

1.5.2 This vision is replicated in paragraph 1.4 of the KLPCS and clearly reflected in the spatial vision of the KLPCS (on page 26). There are also strong links between the SCS vision and the Strategic Objectives of the KLPCS which are summarised in Appendix 2 of this statement.

1.5.3 The links between some parts of the KLPCS and the SCS are very clear and direct. For example, Strategic Objective SO4 "Distinctive, Viable and Sustainable Town Centres" and policy CS6 "Town Centres and Retail Strategy" of the KLPCS both clearly relate to the SCS ambition to create "vibrant and welcoming town centres". In some other respects the linkages between the KLPCS and the SCS are less direct but nevertheless still relevant. For example policy CS7 "Transport Networks" is also likely to help support town centres by encouraging new development to be located where it is accessible by a choice of transport.

1.5.4 The relationship between the KLPCS and the SCS is also set out in section 3.1 of the "Strategic Context" Technical Report (TR06).

1.5.5 The Council has complied with the duty under section 19(2) of the Planning and Compulsory Purchase Act 2004 to "...have regard to..." to the current and previous SCSs (see documents PG31 and PG31a) as it has prepared the KLPCS.

1.6 Has the KLPCS been prepared in accordance with the Local Development Scheme?

1.6.1 The KLPCS has been prepared in accordance with the current Local Development Scheme which came into effect in July 2013 (PP10). It also accords with earlier versions of the Local Development Scheme (PP11, PP12, PP13 and PP14) except in respect of the dates which have been achieved for the various stages in preparing the Plan.

1.7 Does the KLPCS meet all of the legal requirements under section 20(5) (a) of the Planning and Compulsory Purchase Act 2004 and the 2012 Regulations?

- 1.7.1 The Council has had regard to all the matters that it is required to under Section 20(5)(a) of the Planning and Compulsory Purchase Act.
- 1.7.2 Section 19(2)(a) refers to national policies and advice issued by the Secretary of State. The Council has had regard to these as demonstrated for example in its Soundness Self Assessment (SD19), Technical Reports (TR01 to TR04 and TR06) and other hearing statements. Section 19(2)(h) refers to any other local development document which has been adopted by the authority. The only other development plan document to have been adopted by the Council is the Merseyside and Halton Joint Waste Local Plan (PP04). The KLPCS effectively dovetails with this document.
- 1.7.3 Section 24 of the 2004 Act requires the KLPCS to be in general conformity with the Regional Spatial Strategy (RSS). The Regional Spatial Strategy for the North West region (PG18) was revoked on 20 May 2013 by The Regional Strategy for the North West (Revocation) Order 2013.
- 1.7.4 The KLPCS complies with Regulation 8 of the Town and Country Planning (Local Planning) (England) Regulations 2012 which sets out various requirements concerning its contents. With regard to Regulation 8 (5) it should be noted that a number of currently "saved" policies from the Knowsley Replacement Unitary Development Plan (PP01 and PP03) will be superseded by policies in the KLPCS. Appendix C of the KLPCS identifies which current "saved" policies will be deleted and which will continue to be "saved" when the KLPCS is adopted.
- 1.7.5 Regulation 10 sets out further matters to which regard must be had. In relation to Regulation 10(1) (a) the KLPCS contains extensive references to the Merseyside Local Transport Plan (PG23) and will help deliver its key proposals.
- 1.7.6 Regulation 10 (1) (b) and (c) refer to matters concerning the prevention and control of major accident hazards. This matter is covered by "saved" policy ENV4 of the Knowsley Replacement Unitary Development Plan (PP01). Appendix C of the KLPCS confirms that this policy will continue to be "saved".
- 1.7.7 As demonstrated elsewhere in this statement the KLPCS has been subject to a comprehensive series of consultation exercises which exceeds the requirements of Regulation 18.
- 1.7.8 The preparation of the KLPCS has also complied with all the other procedural requirements which are set out in Regulations 17 to 23 as demonstrated in the Legal Compliance Self Assessment (SD18).

Appendix 1: Response from Council consultants (11 October 2013) to comments of CCW on the Habitats Regulations Assessment

11 October 2013

Mr. Jonathan Clarke
Policy Manager (Places)
Knowsley Council
Municipal Buildings
Archway Road
Huyton
Merseyside
L36 9UX

Our Ref:
Your Ref:

Dear Jonathan

**Countryside Council for Wales comments on the Habitat Regulations Assessment for the
Knowsley Submission Core Strategy**

URS has reviewed the comments of 13/02/13 made by Alison Brown of Countryside Council for Wales (now Natural Resources Wales) on the Habitat Regulations Assessment of the Submission Core Strategy. Having reviewed these comments we have concluded that there is no requirement to amend the HRA report and the conclusions of the HRA remain valid.

I have appended to this letter a table responding to each comment made by Ms. Brown.

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

A handwritten signature in blue ink that reads "James Riley". The signature is written in a cursive style with a large, looping 'R' at the end.

Dr James Riley
Principal Ecologist
URS Infrastructure & Environment UK Limited

Appendix: Response to comments made by Countryside Council for Wales

HRA report paragraph reference	Natural Resources Wales ¹ comment	Response
1.4	CCW notes that this Report incorporates both the screening and 'appropriate assessment' stages of the HRA process. CCW is unaware of having been consulted for the screening stage of this HRA process and would welcome clarification as to whether Natural England was involved/consulted at the screening stage.	<p>There was no separate screening report produced. Both screening and Appropriate Assessment are covered in this document. There was therefore no previous round of HRA consultation regarding the Submission Stage Plan. Natural England has been consulted on the screening assessment in as much as both Natural England and CCW have been consulted on this document.</p> <p>The Conservation of Habitats and Species Regulations 2010 (as amended) does not prescribe how consultation should be undertaken, or whether screening and appropriate assessment should be subject to separate consultation exercises, provided that the relevant statutory bodies are consulted on all the HRA work undertaken for the plan before the plan is adopted.</p>
1.8	CCW is not aware of having been consulted on the HRA of the 'Preferred Options' stage.	There was a general public consultation undertaken at this stage. CCW was not consulted separately.
2.3 and 2.7	<p>CCW notes the use of CLG's consultation paper on 'Planning for the Protection of European Sites'. CCW would recommend that reference be made to appropriate HRA methodologies including that published by CCW and which is available on the CCW website at http://www.ccw.gov.uk/landscape--wildlife/managing-land-and-sea/environmentalassessment/habitats-regulations-assessmen.aspx.</p> <p>It should be noted that CCW's guidance on the HRA of plans is not, as stated, part of TAN 5 which is planning guidance produced by the</p>	Noted. However, the overall HRA process, while the various guidance documents have slight subtleties of approach is essentially the same since it is prescribed by law and we are confident that our assessment is in line with guidance.

¹ Formerly Countryside Council for Wales

HRA report paragraph reference	Natural Resources Wales ¹ comment	Response
	Welsh Government. Given the confusion between the two documents within this document, CCW has reservations that both these pieces of guidance have been referred to in this HRA process.	
Box 2	Reference should be made to the Conservation Objectives for each relevant European Site. Full details of Conservation Objectives for sites in Wales can be found within the Core Management Plans available on the CCW website.	We can confirm that the assessment was undertaken with reference to the conservation objectives for the relevant European sites and that the pathways of impact were derived from consideration of the interest features and their conservation objectives. There is no legal requirement to actually cite the conservation objectives within the HRA document.
Table 1	CCW notes and in principle, agrees with the identification of the River Dee and Bala Lake SAC, the Dee Estuary Ramsar/SPA/SAC and the Liverpool Bay SPA as being within the spatial sphere of influence of the Knowsley Core Strategy.	Noted
2.20	CCW acknowledges that it is not practical to assess 'in combination' effects within the context of all other plans and projects in the area however, consideration of in combination effects should include all those relevant plans and projects which may alone or 'in combination' affect the European Sites identified. Additional consideration should therefore be given to United Utilities Water Resource Management Plan and United Utilities Drought Management Plan.	<p>We can confirm that the United Utilities Water Resource Management Plan (WRMP) was drawn upon in undertaking the HRA. It is not specifically listed as an 'other plan or project' to avoid double-counting. The water resource requirements for Knowsley over the plan period are essentially encompassed within the Water Resource Management Plan provisions since the WRMP sets out how the water resource requirements for Knowsley (and the rest of the United Utilities supply area) will be met.</p> <p>The Drought Management Plan is difficult to consider in combination since by definition its implementation is unpredictable. However, the Habitat Regulations Assessment of the Drought Plan comments with regard to options involving the River Dee that <i>'As the drought option would operate under the terms of the</i></p>

HRA report paragraph reference	Natural Resources Wales ¹ comment	Response
		<i>existing licence, no likely significant effects of the operation of the drought option on this site are anticipated, either alone or in combination</i> . It goes on to state that <i>'UU does not have any drought options that result in modifications to abstractions on the River Dee'</i> . A similar conclusion can therefore be drawn with regard to the Knowsley Local Plan in combination with the Drought Plan.
2.22 and 2.23	CCW would suggest that the proposed housing allocations for Cheshire West and Chester, Ellesmere and Neston and other areas served by United Utilities (directly or indirectly) in the context of the River Dee and Bala Lake SAC should also be included within this assessment process.	Noted. However, in considering water resource requirements all future housing within the United Utilities supply area (even if the relevant local authorities are not specifically mentioned in the HRA) is effectively considered 'in combination' because the Water Resource Management Plan which is the basis for our water resource assessments considers all future population growth in the UU area over the plan period collectively.
2.25	CCW notes and welcomes the acknowledgement that expansion of John Lennon Airport has the potential to affect the Dee Estuary SAC/SPA/Ramsar.	Noted
3.1	CCW supports the consideration of pathways of impact.	Noted
3.5 Wintering Birds	Additional consideration should be given to potential effects on roosting and diurnal movement routes as well as to broader migration routes.	Noted. This is an addition to the background 'Pathways of Impact' chapter and does not affect the actual assessment.
3.18: Loss of Supporting Habitat	With regard to the identified issues relating to existing permissions, clarification would be welcomed as to whether Knowsley Bo Co have or are undertaking a Review of Consents process.	Merseyside Environmental Advisory Service has undertaken and continue to undertake Review of Consents for all the Merseyside Authorities.
3.27	It should be noted that the response of Natural England in regard to the Runnymede District Council plan does not set a precedent in the context of Wales and should not be considered as such in regard to diffuse air pollution issues which affect Wales and European Sites in	This is noted. However, the approach we have taken is identical to that taken for all other English authorities I am aware of (where they have considered the matter at all) including those that

HRA report paragraph reference	Natural Resources Wales ¹ comment	Response
	Wales.	have passed EiP.
Figure 5	Clarification is required regarding the origin of this diagram	This figure is adapted from the 2007 Environment Agency document 'Identifying Areas of Water Stress'.
3.30	CCW welcomes the acknowledgement that approximately one third of the water resources supplied to the Integrated Zone is provided from Wales.	Noted
3.31	Clarification would be welcomed as to how the conclusion has been reached that 75% of St Helens' water comes from the River Dee SAC with an additional 20% deriving from Llyn Vyrnwy (which although not a European Site in itself, is strongly associated with the Berwyn SPA).	This was information supplied to URS (then known as Scott Wilson) by United Utilities when the HRA of the St Helen's Core Strategy was undertaken.
9.8	Liverpool Bay SPA. CCW notes the potential for effects on the Liverpool Bay SPA in respect of water quality and pollution events/disturbance etc.	Noted
9.10	CCW notes the potential for 'in combination' effects on the Liverpool SPA resulting from the Gwynt Y Mor Project, Liverpool John Lennon expansion, Liverpool Superport, North west England and North Wales SMP2, Development Plans and proposals for Wylfa B.	Noted
9.13	Reference should be made to CCW's Core Management Plan for Liverpool Bay SPA.	We note this recommendation. However it would not change the HRA assessment or conclusions so we do not believe an addendum to the submitted HRA is required.
9.16	See comments on Chapter 5 in respect of water quality.	No comments on Chapter 5 were included in the letter received from Natural Resources Wales.
9.19	See comments on Chapter 5 in respect of disturbance.	No comments on Chapter 5 were included in the letter received from Natural Resources Wales.
10.12	Dee Estuary SPA/SAC/Ramsar. CCW notes that potential adverse effects resulting from the Knowsley Core Strategy are identified in respect of water abstraction both 'alone' and in combination with other plans and projects.	Noted
10.22	CCW supports the premise that new strategic water resource options will need 'to be in place prior to any developments where additional	Noted

HRA report paragraph reference	Natural Resources Wales ¹ comment	Response
	abstraction impacting European sites would be required’.	
10.24	CCW welcomes the acknowledgement that ‘local authorities’ should ‘play their part’ in ensuring pressures on water resources are minimised. However, CCW is unsure whether water efficiency measures alone will ensure that no additional pressures on water resources occur, notably given the high level of housing development proposed in the North West Area.	Water efficiency measures would (according to the United Utilities Water Resource Management Plan) play a very significant part in ensuring that pressure on water resources are minimised. However we did not mean to imply that water efficiency measures would be all that was required to ensure that unsustainable pressures on water resources do not arise. Although these are the main measures that can be influenced by Local Plan policy they would be accompanied by the more strategic measures set out in the United Utilities Water Resource Management Plan as set out in paragraph 10.19.
12.9	River Dee and Bala Lake SAC CCW notes and, in principle, agrees with the finding of ‘no likely significant effect provided that measures indicated in sections 10.22 and 10.24 and rigorously enforced.	Noted
15.3	CCW notes and welcomes the addition, within para 5.95, of reference to supporting habitat for ‘mobile species’ however, it is suggested that additional reference needs to be given not only to supporting habitat but to movement and migration ‘corridors’. Additional reference should be given, for relevant ‘cross border’ sites to CCW/WG guidance on the HRA process and IROPI.	We note these recommendations. However, the reference to supporting habitat (i.e. habitat outside the boundary of the European site) could be used to apply to movement corridors where appropriate without any changes to the actual wording of paragraph 5.95. We also note the recommendation to make use of CCW guidance on cross-border sites in any HRA work relating to cross-border sites such as the Dee Estuary and Liverpool Bay. This could be applied in practice although it is not considered that particular amendment to paragraph 5.95 is required.
15.8	CCW welcomes, in principle the addition of the intention that ‘infrastructure planning... phasing of infrastructure delivery’ however, it is suggested that additional consideration should be given to phasing of housing development, as suggested in section 10.22 of this report.	We note this recommendation and this will be taken into consideration in future reviews of the Infrastructure Delivery Plan

HRA report paragraph reference	Natural Resources Wales¹ comment	Response
15.10	See comments on 15.3 above.	As above

Appendix 2: Table summarising links between Borough Strategy and KLPCS

Element of Vision in "A Strategy for Knowsley: The Borough of Choice 2012-2023"	Related Strategic Objectives of KLPCS
Attractive, sustainable neighbourhoods with a wide choice of housing and excellent community facilities	SO2, 3, 4,5, 6, 7, 8, 9
Vibrant and welcoming town centres	SO1, 3, 4, 5, 6
Residents and local communities who are able to make positive lifestyle choices	SO1, 3, 4, 5, 6, 8, 9
High quality employment areas which help to drive economic growth in the Liverpool City Region	SO1, 3, 4, 6
Narrowed the gap in deprivation levels both between different parts of the Borough and between Knowsley and elsewhere	SO1, 2, 3, 6, 9