

Re-convened Examination hearings for the Knowsley Local Plan:

Core Strategy Examination

These notes are submitted in relation to Question 1.1, in the new matters arising since the November 2013 hearings for the Knowsley Local Plan, Core Strategy Examination.

Question 1.1 asks *'What are the implications of the new housing population projections for the objectively assessed need for housing in Knowsley borough?'*

This follows on from the release in May 2014, of the 2012 based sub-national population projections for the period 2012 – 2037, published by the Office of National Statistics.

1. Comments upon population projections.

1.1 Part of paragraph 159 of the National Planning Policy Framework (NPPF) states that the Strategic Housing Market Assessment for an area should identify the scale and mix of housing that the local population is likely to need over the plan period and which meets household and population projections, taking account of migration and demographic change.

1.2 Section 2.10 (page 16) of the submitted Knowsley Core Strategy (July, 2013) states 'National projections indicate that the borough's population will increase by about 4000 between 2011 and 2021. This figure is based upon the interim 2011-based sub national population projections.

1.3 Section 4.3.6 (pages 44 - 45) of Planning for Housing Growth in Knowsley (Technical Report produced by Knowsley Council in 2013) gives a projection that the population of Knowsley is expected to rise by just over 3000 people between 2011 and 2021

1.4 However, the sub-national population projections update (June 2014 version, document SD31 in the examination library) gives a much lower figure, over a greater time period. Section 6.1 (page 16) of this document states that Knowsley's total population is expected to rise by 1800 persons between 2012 and 2037.

1.5 In the document Planning for Housing Growth in Knowsley (Technical Report produced by Knowsley Council in 2013), reference is made to demographics being one of the drivers behind the need and demand for new housing. Section 2.1.8 (page 15) of this report states that 'the Office of National Statistics population projections are directly relevant to considering the level of new housing to be provided.'

1.6 Additionally, Section 4.3.16 (page 51) of the above report states 'The council is bound to consider the 2011-based projections as the most accurate and up-to date' and 'the most reliable basis on which to estimate Knowsley's future population'. This is presumably now the case, for the 2012-based projections.

1.7 The new figures provided by the 2012-based sub-national population projections, indicate a much lower rate of population growth, which one would assume would translate to a lower need for housing, than that previously predicted.

2. Excessive amount of land proposed for release from Greenbelt, to meet housing target.

2.1 In connection with the reduction in projected population increase, I would highlight that even using the target figure of 8100 net dwellings over the plan period, the potential Greenbelt supply, from reserve sites, of a minimum of 3258 dwellings (shown in Core Strategy Table 5.2) is more than sufficient to meet the 2271 shortfall from the total identified supply (as per the Inspector's Interim Findings, January 2014). The reserve sites figure also excludes any potential supply from the Carr Lane, Prescott site, or the Knowsley Lane, Huyton site.

2.2 These figures indicate that it is proposed to release much more land from the Green Belt than is actually required, to meet any shortfall, arising from the target figure. The 2012-based population projections, indicating a much lower rate of population increase, would suggest that the target figure is too high, and that therefore the amount of land being considered for Greenbelt release is higher still, than that required.

2.3 Given the harm to the Greenbelt these potential releases will cause, I would suggest that the amount of land being considered for Greenbelt release be looked at again, and some sites (such as KGBS19 and KGBS20 (East of Halewood (north and south))) be removed from the list of reserve sites, and retained within the Greenbelt.

3. Changes in household size, age structure, and potential implications for the density at which housing is provided

3.1 Various reports, such as the Planning for Housing Growth in Knowsley Technical report (2013), comment upon why the forecast total for new housing need, is higher than the forecast population growth. Factors here, include declining household size. Section 4.3.23 (page 54) of this report mentions that one of the driving factors towards smaller households is a reduced number of children per household, and an increased number of households with no children. Elsewhere, a rise in single parent families, and an increase in the number of people living alone are also cited as reasons.

3.2 Whilst these factors will be contributory to the rise in the number of households, it would be expected that smaller households would have a requirement for smaller dwellings, and that therefore new dwellings to cater for smaller households will be built at higher densities.

3.3 Section 1.11.2 (page 16) of the Knowsley Strategic Housing Market Assessment (Final Report, 2010) highlights the scale of under-occupation in Knowsley, at 35.1% of all households, commenting that this is significant. This figure, along with the decline in household size, would suggest that the requirement is for smaller properties, which tend to be built at higher density.

3.4 Another important, and relevant, aspect of the 2012-based population projections (document SD31), is the forecast age structure. The projections show a big decline (of around 9700 persons) in the number of working age people in Knowsley, by 2037. It is this age group that are more likely to be household-forming. Additionally, there is a projected rise in the population over 65 years of age. An ageing population is likely to require smaller dwellings (both due to a decline in household size, and a likely desire for smaller accommodation). This again should theoretically increase the density of dwelling provision.

3.5 Provision of specialist accommodation for the elderly as well as being likely to be at higher density, may also free up stock that this age group formerly occupied.

3.6 In connection with the density of proposed new dwellings, section 3.34 (page 23) of the Knowsley Local Plan Monitoring Report (2012) states that the projected rise of 7000 dwellings between 2008 and 2028 is due in the main to an increase in the number of single person households. It would be expected that dwellings for single persons would be built at higher density.

3.7 Recent Government initiative to address under occupancy may well free up larger properties, whilst increasing demand for smaller properties (which tend to occur at higher density).

3.8 The lower population projections (along with a projected decline in the population of people of household forming age), suggests that the housing target figure, over the plan period, is too high, and that density assumptions are too low. The recently released population projections also add to evidence, suggesting that the amount of land, being proposed for release from the Greenbelt, is excessive for what is actually required.

4. Overall low density of housing provision, for reserve sites.

4.1 Additional to the previous comments, I draw attention to what appears to be a squandering of the land resource. In Document EX25 (Supplementary Information – outstanding requests from hearing sessions), Table 1.1 gives a breakdown of locations, proposed for removal from the Greenbelt, by gross area. The sites proposed for removal to accommodate housing development (not including any of the Prescott sites or the Knowsley Lane, Huyton site, and omitting the safeguarded land at Knowsley Village) amounts to 207.89 hectares. The potential green belt housing supply given in the submitted Core Strategy (Table 5.2) is 3258 dwellings. This works out at less than 16 dwellings per hectare.

4.2 Given that some of the areas being proposed for removal from the Greenbelt are high quality areas of farmland, still in agricultural operation, the release of such a large area of land from the Greenbelt, which will result in such a low overall density of development at these sites, appears to be a very wasteful usage of land. This is an inefficient usage of land and also at odds with minimising the loss of agricultural land, as suggested in the Greenbelt Technical Report (Section 0.7, page 7).

4.3 As the world's population increases, good quality, highly productive agricultural land is going to become more important. No distinction appears to have been made between areas according to the grade of agricultural land, and whether that land is productive and viable.

4.4 Section 4.37 (page 21) of the Knowsley 2012 SHLAA gives average densities of gross completions for two time period (2009/2010 and 2010/2011). The average densities quoted range from 54.4 dwellings per hectare to 65.5 dwellings per hectare. Both figures are significantly greater than the benchmark figure of 30 dwellings per hectare used in the SHLAA, and recommended in the Core Strategy. This would also suggest that the amount of land being considered for removal from the Greenbelt for housing, is far in excess of what is actually required.

5. Re-consideration of amount of land being considered for release from the Greenbelt.

5.1 With the above in mind, I would ask that the area of land being considered for removal from the Greenbelt is re-considered and reduced in quantity. In particular, I would ask that at the very least, site KGBS19 (East of Halewood (north)), be removed from the list of reserve sites, and be retained as Greenbelt.

5.2 I gave my reasons for this at the examination hearings in November 2013 under item 5.25. These reasons, summarised here (5.2 to 5.7), include the openness of the site, and how the land relates very closely in character and appearance, to the adjacent land to the north and east, which it is proposed to keep within the Greenbelt.

5.3 This area of land presently fulfils all the functions of Greenbelt land. Development of this site will result in urban sprawl, cause a significant incursion into the surrounding countryside, causing harm to the Greenbelt in this area. Additionally, it will result in an unnecessary and wasteful loss of high quality, and highly productive, farmland.

5.4 The present Greenbelt boundary, at this location, follows the clear, well-defined, robust and defensible boundary of Greensbridge Lane. There is also a strong presence of views from Greensbridge Lane, across the site in question, and across Ditton Brook, to the fields and woodland, to the north and east.

5.5 Half of the site falls within Flood Zone 3. This is reported in the Strategic Flood Assessment (examination library document EB15). The site assessment for this parcel of land also states that 'Flooding is likely to get worse on site as the effects of climate change are realised'.

5.6 It has been assumed by Knowsley Council that due to the flood risk, only half of the site (KGBS19) will be developable (Green Belt Technical Report, 2013). This will result in a low overall housing density for this site. I therefore ask whether removal of this site from the Greenbelt, is showing a commitment to the minimising of the loss of agricultural land, as mentioned in Section 0.7, of the Greenbelt Technical Report.

5.7 The site has biodiversity value, and is made use of by Schedule One (specially protected) Barn Owls, which nest nearby, with Water Vole having been recorded along the brook. Additionally, species covered by the North Merseyside Biodiversity Action Plan such as Skylark, Grey Partridge, Lapwing and Brown Hare are found here. Species notable from a North Merseyside point of view, such as Yellowhammer, also breed here.

6. Suggested removal of safeguarded sites, and for these areas to remain as Greenbelt.

6.1 As already indicated, even assuming the target figure of 8100 new dwellings over the plan period, there is plenty of spare capacity, within the broad location reserve sites. More than sufficient, to meet any shortfall from the identified supply. With this in mind, I would suggest that there is no requirement to safeguard the land at Knowsley Village, and that this land should remain within the Greenbelt.

7. Potential for neighbouring authorities to accommodate any shortfall, in building land, as part of the 'Duty to co-operate'.

7.1 I believe that any shortfall in need at Knowsley could be accommodated within the neighbouring authority area of Liverpool. 44% of the jobs in Liverpool are presently taken by people who reside outside of the city (Liverpool Strategic Housing Market Assessment, May 2011). Many of these are Knowsley residents.

7.2 In section 3.7.2 (page 47) of the Knowsley SHMA, the amount of Knowsley residents in employment, who travel to Liverpool for work is given as 36.3%, based upon 2001 Census data. In section 3.7.4 (page 48) of the Knowsley SHMA, this rate is put at 29.9% (based upon the findings of the 2007 Knowsley Housing Needs study). Figure 3.6 Knowsley's Daily Commuting Flows (page 33 of the Knowsley Local Plan Monitoring Report) show that 18212 Knowsley residents travel to Liverpool to work. There is a desire, by the Liverpool authorities to reduce this commuting trend, and to elevate containment (Liverpool SHMA).

7.3 Previous studies have suggested there is sufficient housing capacity within Liverpool, to accommodate the needs arising in neighbouring local authority areas, such as Knowsley. These include the Merseyside Sub-Region Urban Housing Capacity Study (2004) and the Housing and Economic Development Evidence Base Overview Study (prepared for Liverpool City Region Partners) (2011).

7.4 The potential of spare capacity in neighbouring authority areas (principally Liverpool), to be utilised to meet any unmet needs in Knowsley, should be investigated, and considered more fully, as set out in paragraphs 178 to 181 of the National Planning Policy Framework. Failure to do this will result in significant harm to the Greenbelt, and undermine the aims and objectives of the Greenbelt.

7.5 Parts of Knowsley were originally designed as over-spill areas for Liverpool, and traditionally there was an overall out-migration from Liverpool to Knowsley. Liverpool has seen a recent increase in population, in particular driven by a rise in city centre living (Liverpool Local Development Framework Draft, 2012 and Liverpool City Centre Strategic Investment Framework, 2012). It would make spatial planning sense for spare housing capacity from within Liverpool to be utilised, to meet any shortfall arising within Knowsley. It would also make environmental sense, in reducing the need for people to travel.

7.6 In the past, Liverpool's population has declined, whilst that of neighbouring authority areas such as Knowsley has increased. Recent findings from the 2011 Census data, would suggest a reversal of this, with Knowsley's population declining whilst Liverpool's population has increased. These findings suggest greater population stability at the sub-region level, as opposed to looking at each local authority area in isolation. In connection

with this, I would draw attention to a topic paper produced by Dr. Peter Brown of Liverpool University Department of Civic Design (attached as a separate document) entitled 'Population of the Liverpool City Region: long-term stability exemplified' (2010).

7.7 In summary, the above paper uses various census data, to show that whilst between 1931 and 2001, the population of Liverpool had halved, that of the Liverpool City Region (which includes the borough of Knowsley) had remained virtually the same. This being mainly a result of Liverpool's population moving further from the city centre, with much of this movement being across municipal boundaries.

7.8 At present, with regards to the 'Duty to co-operate', the evidence available suggests that the Council notifies, but there is little evidence of collaborative working. This is especially the case with regards to Liverpool, which appears to have capacity, to meet any unmet requirements of Knowsley.

7.9 Liverpool has a five year housing supply (with a 12% buffer, as identified in the 2012 Liverpool Strategic Housing Land Availability Assessment). However, the housing target given in the emerging Liverpool Local Plan is far in excess of that identified in the 2011 Liverpool Strategic Housing Market Assessment. Additionally, Liverpool's emerging local plan has not yet gone through an examination stage. The Liverpool SHMA also identifies nearly 15,000 vacant dwellings within the city.

7.10 It is worth adding to the above, that there appears to be an indication of an over-supply of employment land within Liverpool (Section 5.16 of the Liverpool Annual Monitoring Report for 2012 (published in 2013)). This may be relevant, in connection with the recent comments of the Secretary of State for Communities and Local Government (Daily Telegraph 13 June 2014). This article suggests that it may be made easier for former industrial sites, and other sites identified as employment sites, to be converted to housing sites, in order to prevent Greenbelt sites having to be built upon.

7.11 Another factor in Liverpool likely to be relevant, is the explosion in the provision of student accommodation within the city centre area. Recent years have seen a huge increase in the number of new buildings designed for student accommodation. In addition to that already up and running, there are some huge schemes under construction, others given planning approval and not yet started, and a number of schemes under consideration. This huge growth in student accommodation is very likely to free up housing stock, and land, in other parts of Liverpool, which have been, and are presently, used by students.

Conclusions

The housing targets set by Knowsley Council are too high (given the recent 2012-based population forecasts). Density assumptions are too low. More land is being considered for removal from the Greenbelt, than is actually required. Too much of the land being considered for removal from the Greenbelt is high quality, highly productive agricultural land. Allocation of some Greenbelt sites as reserve sites for housing, will result in harm to the Greenbelt, and undermine its aims and objectives.

References

Daily Telegraph (13 June 2014) 'Build new homes on brownfield land'.

Housing and Economic Development Evidence Base Overview Study (Prepared for Liverpool City Region Partners) (May, 2011) – Final Research Report.

Knowsley Local Plan: Core Strategy: Greenbelt Technical Report (July 2013).

Knowsley Local Plan: Core Strategy: Submission Document (July, 2013).

Knowsley Local Plan: Core Strategy Examination: Inspector's Interim Findings (January 2014) (Examination library document EX26).

Knowsley Local Plan: Core Strategy: Sub-National Population Projections Update (June, 2014) (Examination library document SD31)

Knowsley Local Plan Monitoring Report 2012 (published December, 2012).

Knowsley Metropolitan Borough Council Strategic Flood Risk Assessment (2012) (Examination library document EB15).

Knowsley Supplementary Information – Outstanding Requests from hearing sessions (20.12.2013) (Examination library document EX25).

Liverpool Annual Monitoring Report for 2012 (published 2013).

Liverpool Local Development Framework Draft (2012). Liverpool City Council.

Liverpool Strategic Housing Land Availability Assessment update 2012 (published August, 2013).

Liverpool Strategic Housing Market Assessment Main Report (May, 2011).

Liverpool City Centre Strategic Investment Framework (2012). Liverpool Vision.

Merseyside Sub-Region Urban Housing Capacity Study. Final Report (December, 2004).

National Planning Policy Framework (March, 2012).

North Merseyside Biodiversity Action Plan Produced by the Merseyside Biodiversity Group (produced 2001, reviewed 2008).

Office for National Statistics (2012) 2011 Census, Key Statistics for Local Authorities in England and Wales.

Planning for Housing Growth in Knowsley – Technical Report (Knowsley MBC, 2013).

Population of the Liverpool City Region: long-term stability exemplified – 2010 topic paper by Dr. Peter Brown (Department of Civic Design, Liverpool University) published on the website of Merseyside Civic Society.

Population of the Liverpool City Region : long-term stability exemplified

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[This version : 16 April 2010]

Introduction

This note summarises the outcome of an examination of long-term population change. Population counts from censuses between 1901 and 2001 are tabulated for the districts comprising Merseyside and the surrounding areas that constitute a series of progressively wider definitions of the 'Liverpool City Region'. A simple method is used to highlight patterns of variation in the population figures, using 1931 as the base, the census year in which Liverpool's population was at its peak. Brief comments are offered on the tabulations and some of the consequences that should follow from this analysis.

Geography of the Liverpool City Region

A starting point for the analysis is the 1974 Merseyside county area, comprising the metropolitan districts of Knowsley, Liverpool, St Helens, Sefton and Wirral. More recently, notably in relation to transport, the neighbouring district of Halton has been included in a wider definition of the area that is covered by the Liverpool City Region. Other districts taken into account here in the specification of progressively wider definitions of the city region include Ellesmere Port & Neston and West Lancashire [but *not* reported here: Warrington, Chester, Vale Royal & Flintshire (see Figure 1)].



Figure 1 : Local authority district boundaries in widening definitions of the Liverpool City Region

The assembly of data for these areas, derived from the more recent census counts (1971 – 2001), was relatively straightforward. A greater challenge was posed by the task of aggregating, to the current more familiar local authority district geography, the counts recorded in earlier censuses for the former County Boroughs, Municipal Boroughs, Urban Districts and Rural Districts for which accurate boundary maps were frequently difficult to locate. Population counts for these areas were obtained for the census year between 1901 and 1961 from 'A Vision of Britain Through Time 1801-2001' website. A further set of more up-to-date population counts was obtained, in the form of the mid-year estimates (MYE) of district populations, published by the Office for National Statistics for 2008.

Initial Spreadsheet Population Tabulations : Merseyside Districts

The initial task was to present the district counts for the census years 1901 to 2001, and 2008 MYE figures, for the five districts that comprise Merseyside, as seen in Table 1. The table reveals that the former county area had a population of just under 1.2 million in 1901 and that this grew to just over 1.5 million by 1931, the year in which Liverpool recorded its highest census head count, at 855,688.

Table 1 : Merseyside District Populations : 1901 - 2001

Year	Merseyside Districts					M'side Districts Total
	Knowsley	Liverpool	St Helens	Sefton	Wirral	
1901	25862	706545	143546	148494	151735	1176182
1911	27501	749178	163095	171988	190275	1302037
1921	27868	805046	170689	198935	215526	1418064
1931	30531	855688	175590	207927	238989	1508725
1941						
1951	96628	790838	189713	265916	271296	1614391
1961	160104	745750	191622	279153	293475	1670104
1971	197819	610114	221233	277883	320232	1627281
1981	172991	503722	189251	298204	338952	1503120
1991	152091	452450	178764	289542	330795	1403642
2001	150459	439473	176843	282958	312293	1362026
2008 (MYE)	150800	434900	177500	275100	309500	1347800

Source: A Vision of Britain Through Time 1801-2001 [based on census data]

While Liverpool's population declined in successive censuses to its 2001 level of almost 440,000, the county total grew to peak at 1.67 million in 1961 before consistently declining, in each later census year, to reach 1.36 million in 2001.

Examination of district figures reveals interesting contrasts. For example, Knowsley grew, from a very low initial total of almost 26,000 in 1901, by a factor of almost five, to reach just over 150,000 in 2001. Meanwhile, St Helens only increased by about 20% over this period and Wirral only roughly doubled its population.

While interesting, and eventually distinguishable by close scrutiny of the table, patterns of change are not clear and are at least partially obscured by the relatively large numbers.

In order to highlight patterns of change more clearly, the figures in the table have been transformed and presented in index form, i.e. taking a base year and comparing all subsequent counts with the base count set to 100. Logic points to 1931 as the base year as our aim is to highlight the changing distribution of population in the Liverpool City Region and its comparison with Liverpool's population over time, as seen in Table 2. This enables a much clearer impression to be gained of the relative scale of change that has occurred in each of the districts and across Merseyside as a whole since 1931.

Table 2 : Merseyside District Populations : 1901 - 2001

Table with population figures expressed in index form with respect to 1931 figures, the peak census population for Liverpool

Year	Merseyside Districts					M'side Districts Total
	Knowsley	Liverpool	St Helens	Sefton	Wirral	
1901	85	83	82	71	63	78
1911	90	88	93	83	80	86
1921	91	94	97	96	90	94
1931	100	100	100	100	100	100
1941						
1951	316	92	108	128	114	107
1961	524	87	109	134	123	111
1971	648	71	126	134	134	108
1981	567	59	108	143	142	100
1991	498	53	102	139	138	93
2001	493	51	101	136	131	90
2008 (MYE)	494	51	101	132	130	89

The first figure to note is the index value of 51 for Liverpool in 2001, indicating that the city's population all but halved over this time period. In stark contrast, the corresponding 2001 index value for Knowsley is as high as 493, reflecting an almost five fold increase in the district's population between 1931 and 2001.

During this period, both Sefton's and Wirral's populations increased by almost one third while, by 2001, St Helens had returned to almost its 1931 level after an intervening rise. Finally, we note that the overall Merseyside total fell by 10% over the 1931 to 2001 period, indicated by the 2001 index value of 90.

LCR Extension : Halton, Ellesmere Port & Neston and West Lancashire

As noted above, Halton (including Runcorn) has been added to the conventional definition of Merseyside for transport planning purposes. Ellesmere Port and Neston is another logical candidate for addition to a wider definition, as a southerly extension of the Wirral. West Lancashire, including Skelmersdale, Ormskirk and Maghull, also interacts strongly with Liverpool and is included in this wider definition.

Table 3 records the index values resulting from the addition of these three districts.

Table 3 : District Populations 1901 - 2001 : extended City Region including Halton, Ellesmere Port & Neston and West Lancashire

Table with population figures expressed in index form with respect to 1931 figures, the peak census population for Liverpool

Year	Merseyside Districts					M'side districts total	Districts etc beyond Merseyside ...				
	Knowsley	Liverpool	St Helens	Sefton	Wirral		[H] Halton	[E] E Port+ Neston	M'side+ H+ EP&N	[WL] West Lancs	M'side+ H+E+ WL
1901	85	83	82	71	63	78	98	34	78	59	78
1911	90	88	93	83	80	86	97	61	86	65	86
1921	91	94	97	96	90	94	98	74	94	96	94
1931	100	100	100	100	100	100	100	100	100	100	100
1941											
1951	316	92	108	128	114	107	124	172	109	138	109
1961	524	87	109	134	123	111	133	230	113	168	115
1971	648	71	126	134	134	108	158	319	113	244	117
1981	567	59	108	143	142	100	207	334	107	240	111
1991	498	53	102	139	138	93	211	329	101	243	105
2001	493	51	101	136	131	90	201	332	98	244	102
2008 (MYE)	494	51	101	132	130	89	204	333	97	247	101

This shows that West Lancashire's population grew by a factor of 2.5 between 1931 and 2001, mid-way between the rates in Halton (x2) and Ellesmere Port & Neston (x3). However, more striking is the fact that, this wider definition of the Liverpool City Region, had a population figure in 2001 that is two percent greater than the corresponding figure in 1931 (index value 102). Thus, while Liverpool's population halved during this period, that of the wider definition of the Liverpool City Region has remained virtually the same.

Some Observations

- Elected representatives, officials and the press must stop talking about the halving of Liverpool's population as this gives a negative impression of the area's fortunes.
- In reality half of Liverpool's population has simply moved further from the city centre.
- For many, this meant crossing the municipal boundary (sometimes reluctantly) – a line on a map that takes no account of economic & cultural patterns of behaviour.
- When considering the area's economic, cultural, health or educational attainment, it makes no sense to compare the city of Liverpool with, say, Birmingham or Leeds, as Liverpool does not include much of its outer residential areas, whereas others do.
- Misrepresentation of such comparative data often casts Liverpool (and Manchester) in an undeserved bad light.
- We note that preparations for the London Olympics are being handled on the basis of London as a whole, not just the borough in which the games will be taking place.
- Why is the city of Liverpool so often considered in isolation from its neighbours?
- City councillors and officials (including those of Liverpool Vision) need to enter more fully into the spirit of the Multi Area Agreement in tackling cross-boundary issues, including transport, housing, economic development and employment generation, in a more effectively co-ordinated manner.
- The analysis presented here reinforces the case for the acceptance of a more widely drawn definition of the Liverpool City Region for these purposes.