**Title**
Health Impact Assessment of the Local Plan: Core Strategy (Proposed Submission Document)

**Directorate**
A Joint report by the NHS Public Health team, Directorate of Regeneration, Economy and Skills and Chief Executives Directorate

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**Purpose**
To detail the rapid prospective Health Impact Assessment of the Local Plan: Core Strategy, which has been undertaken at Proposed Submission Stage.

**Description**
This document firstly explains the links between health and spatial planning, the Health Impact Assessment process and methodology to be applied to this Health Impact Assessment (HIA). Some background to the Core Strategy along with proposed timescales for implementation is given, along with a profile of Knowsley with particular regard to existing health and other related issues.

Section 2 gives an introduction to the Healthy Urban Development Unit (HUDU) Checklist ‘Watch out for Health’ and goes on to analyse the potential impact of proposed Submission policies in relation to the evidence provided by the HUDU, including identification of potential positive and negative impacts. Recommendations as to where the document could be strengthened to best reflect the evidence are also provided.

**Superseded documents**
Interim Health Impact Assessment undertaken in May 2011, at Core Strategy Preferred Options Stage

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**Related information**
Further information about Health Impact Assessment to be found at:
- **IMPACT**, International Health Impact Assessment Consortium, University of Liverpool, [http://www.liv.ac.uk/ihia/](http://www.liv.ac.uk/ihia/)
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3
Executive Summary

0.1 Knowsley Council are currently developing a Local Plan which will guide spatial planning and investment decisions in the Borough up to 2028. The Local Plan includes a set of documents which, once adopted, will impact significantly on the physical environment of the Borough. This in turn will have a resultant impact on the social and economic landscape of Knowsley, and on the health of the local population.

0.2 Spatially, Knowsley consists of a belt of large suburban towns on the outskirts of Liverpool. The area has a large amount of open space and several major employment areas. Issues facing the current population include high levels of deprivation including high levels of worklessness and low levels of educational attainment. The Borough also has an ageing population.

0.3 In terms of health related issues, life expectancy within the Borough is lower than the national average for both males and females. Rates of lung cancer, respiratory disease, coronary heart and cardiovascular disease are higher than national and regional levels. Recorded crimes within the Borough have significantly reduced within recent years, although perception of crime has not fallen. In terms of mental health, evidence suggests that Knowsley residents have relatively low mental wellbeing and are less likely to join sports clubs, religious groups or educational groups. However, Knowsley residents report positively around local identity and belonging, and satisfaction with their local area.

0.4 The links between physical environmental conditions and human health and wellbeing are increasingly prevalent. Health determinants such as the environment, income, employment, transport, housing, crime and the social and physical condition of local neighbourhoods can all contribute to good and poor health. Recent government planning guidance recognises these links and advocates that the current planning system strives to create Sustainable Communities, which incorporates reference to human health.

0.5 Knowsley Council is currently producing the Core Strategy which is the central document to the Local Plan. It sets out the Local Plan’s vision, strategic objectives and delivery strategy. The development of the Core Strategy includes a number of defined stages of drafting and consultation. In order to ensure that health has been properly considered within the Core Strategy, an Interim Health Impact Assessment (HIA) was undertaken in May 2011 at Preferred Options stage\(^1\) and a Final HIA at Submission Document stage\(^2\) (the subject of this report).

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\(^1\) DRAFT Health Impact Assessment of Local Development Framework: Core Strategy Preferred Options Report (Knowsley MBC & NHS Knowsley, 2011)

\(^2\) Local Plan: Core Strategy Proposed Submission Document (Knowsley MBC, 2012)
0.6 The Interim HIA used evidence from the Healthy Urban Development Unit (HUDU) Checklist ‘Watch out for Health’, along with relevant extracts from the Preferred Options document, to identify where the Core Strategy supported the national evidence and where changes could potentially be required to ensure that the document has a positive impact on human health.

0.7 Overall, the Interim HIA concluded that the Core Strategy Preferred Options Report largely reflected the best practice given in the Healthy Urban Development Checklist, in all of the areas considered. Best practice was reflected particularly well in the areas of housing, accessibility and transport, resource minimisation and climate change.

0.8 Some areas of concern, however, were raised at the Interim HIA stage. These largely focused on the proposed release of land from the Green Belt for development because of the potential implications for accessibility, neighbourhood amenity, and loss of opportunities for physical activity. Recommended changes to these policy areas were suggested as part of the Interim HIA.

0.9 The Interim HIA made recommendations for changes to the Core Strategy. A significant number of these recommendations were accepted and changes were made to the Core Strategy as a result. Where changes were not made, reasoned justification has been given and in general a more appropriate process for taking the recommended action forward has been suggested. Details of how the Council has dealt with the recommendations can be found in Knowsley Local Plan: Core Strategy Accounting for Assessments (Knowsley MBC, 2012).

0.10 The Core Strategy is now at Submission stage. The Core Strategy is submitted to the Secretary of State at this stage. It consists of 28 policies, covering all aspects of spatial planning, including housing, greenspace, economy, retail, etc. A Final HIA (the subject of this report) has therefore been produced to identify potential positive and negative impacts of the policies and provide recommendations to ensure that the Core Strategy, once adopted, will largely impact positively on the health of the local population.

0.11 The Final HIA makes further recommendations which are summarised below. The conclusion of this report is that further changes to the Local Plan: Core Strategy Proposed Submission Document are not required. The further recommendations relate to further work required to ensure that health and wellbeing are embedded within additional appropriate Local Plan documents as they are developed.

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4 The Core Strategy will be submitted to the Secretary of state in 2013.

5 An addition policy, SD1 “Sustainable Development”, has been added since the Preferred Option stage.
Summary of Recommendations

Health Impact Assessments

- That guidance is developed, separate to the Core Strategy, to govern where further Health Impact Assessments would be applied to the following sites:
  - Future housing sites
  - Edge or out of centre sites
  - Large transport infrastructure proposals
  - Schemes which involve major development proposals on any ‘Reserved’ or ‘Safeguarded’ Location within the Green Belt
  - Sites of future mineral extraction work and/or major development within areas of existing or proposed mineral extraction

Local Plan: Site Allocations and Development Policies document

- That the future Local Plan: Site Allocations and Development Policies document considers:
  - A more bespoke approach with regard to vacancy in local centres in order to proactively encourage the development of new businesses and services
  - A more bespoke approach with regard to the suitability and function of different retail uses including:
    - Provision of a suitable retail environment for affordable, fresh produce, particularly in some of the more deprived areas of the Borough.
    - Limiting the numbers of additional takeaway food outlets within certain areas of the Borough.
  - How to retain or encourage access to adjacent open/rural areas (e.g. footpaths) and preserve as many natural features of the original character of the landscape as possible (e.g. tree lines and hedgerows).

- That Public Health and other health partners and stakeholders are involved in further consultation to develop the Local Plan: Site Allocations and Development Policies document.

Design Quality in New Development Supplementary Planning Document

- That more detailed guidance is included within the emerging Design Quality in New Development SPD, in relation to the following issues:
  - The importance of creating legible environments where people can orientate themselves easily both within development sites and internally within buildings
- Internal building design reflecting health objectives, for example, by placing stairs in a more prominent position than the lifts, making optimum use of views and natural light.

- The importance of highway design in creating streets which encourage social interaction and play e.g. Home zones and/or the Manual for Streets.

- Consideration of the potential conflicts between aesthetic design quality and environmentally friendly design.

- The design and setting of employment sites in creating healthy workplaces.

**Sustainability in Design and Construction Supplementary Planning Document**

- That more detailed guidance is included within the emerging Sustainability in Design and Construction SPD, in relation to appropriate:
  - Amounts of recycled and secondary aggregated materials used in construction.
  - Use of biomass.

**Ensuring Choice of Travel Supplementary Planning Document**

- That more detailed guidance is included within future versions of the Ensuring Choice of Travel Supplementary Planning Document, in relation to improving health and wellbeing of local people, by encouraging physically active means of travel and providing access to adequate healthcare facilities.

**Noise**

- Consideration be given to where noise issues could be considered as part of a future Local Plan document, as appropriate.

**Access to fresh food**

- The Council considers other opportunities to encourage the provision of food within areas where access to fresh food and diet are particularly poor, for example, through Asset Management.

0.12 This Final HIA report updates the Interim HIA and presents a fresh assessment of the health impact of the Local Plan: Core Strategy Proposed Submission Document. It largely follows the structure of the Interim HIA report with Section 1 setting out the background to health and spatial planning issues. The Local Plan process is then explored and a detailed HIA methodology given. This is followed by a brief profile of the Borough to highlight some of the health and wider issues prevalent within the Borough.

0.13 Section two of this report sets out the findings of the Final HIA, giving details of the potential positive impacts and negative impacts of the proposed policies, in relation to the HUDU guidance. Recommendations suggested as part of the Interim HIA are then given, followed by the subsequent comments received in response from the
Council’s Policy, Impact and Intelligence Division. These indicate the level of any changes (if any) that have been made to the proposed Submission Document of the Core Strategy as a result of the initial recommendations. Where the comments have resulted in further recommendations, these have been stated.
SECTION 1: HIA PROCESS AND BACKGROUND

1.1 Introduction

1.1.1 This report is a rapid and prospective Health Impact Assessment (HIA) of the Knowsley Core Strategy which is currently at Proposed Submission stage. The Core Strategy forms the overarching document within the Local Plan which sets out Knowsley’s vision for spatial development within the Borough up to 2028. The Strategy will guide spatial planning and investment decisions made within this period. This HIA updates the Interim HIA undertaken in May 2011 at the Preferred Options Stage. The Interim Health Impact Assessment can be found on the Council’s website.

1.1.2 The links between physical environmental conditions and human health and well-being are increasingly prevalent. Given the significant influence which the Local Plan including the Core Strategy will have on the physical development of the Borough, it is pertinent to undertake a HIA to ensure that development will largely impact positively on the health of the local population.

1.1.3 The first section of this document explains the links between health and spatial planning, the process and methodology applied to both the Interim and Final HIA. Some background to the Core Strategy along with proposed timescales for adoption is given along with a profile of Knowsley with particular regard to existing health and other related issues.

1.1.4 Section 2 gives an introduction to the Healthy Urban Development Unit (HUDU) Checklist ‘Watch out for Health’ and goes on to analyse the potential impact of relevant policies in the proposed Submission Document in relation to the evidence provided by the HUDU, including identification of potential positive and negative impacts. Recommendations as to where the Local Plan could be strengthened to reflect the evidence most effectively are also provided.
1.2 Health and Spatial Planning

1.2.1 Health can be defined as “a state of complete physical, mental and social well-being not just the absence of disease or infirmity (World Health Organisation, 1946)”.

1.2.2 Over recent years there has been increased recognition of the wide range of social, environmental and economic factors that contribute to human health. Factors such as environment, income, employment, transport, housing, crime and the social and physical condition of local neighbourhoods all contribute to good and poor health. These are called health determinants. Categories of health determinants are show in Figure 1, and more detailed examples in Figure 2.

*Figure 1: Categories of health determinants*

1.2.3 Spatial planning is the process which deals with the design and organisation of the physical environment through the development of plans and policies which guide new development. This process therefore has the potential to significantly impact on a population’s health and wellbeing, similarly in both a positive or negative way.
Figure 2: Examples of health determinants

<table>
<thead>
<tr>
<th>Biological factors</th>
<th>Examples of specific influences on health (health determinants)</th>
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<tbody>
<tr>
<td></td>
<td>Age, sex, genetic factors</td>
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<tr>
<th>Personal / family circumstances and lifestyle</th>
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<tbody>
<tr>
<td>Family structure and functioning, primary / secondary / adult education, occupation, unemployment, risk-taking behaviour, diet, smoking, alcohol, substance misuse, exercise, recreation, means of transport (cycle / car ownership)</td>
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</tbody>
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<table>
<thead>
<tr>
<th>Social environment</th>
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<tbody>
<tr>
<td>Culture, peer pressures, discrimination, social support (neighbourliness, social networks / isolation), community / cultural / spiritual participation</td>
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<table>
<thead>
<tr>
<th>Physical environment</th>
<th></th>
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</thead>
<tbody>
<tr>
<td>Air, water, housing conditions, working conditions, noise, smell, view, public safety, civic design, shops, (location / range / quality), communications (road / rail), land use, waste disposal, energy, local environmental features</td>
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<thead>
<tr>
<th>Public services</th>
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<tr>
<td>access to (location / disabled access /costs) and quality of primary / community / secondary healthcare, child care, social services, housing / leisure / employment / social security services; public transport, policing, other health-relevant public services, non-statutory agencies and services</td>
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<tr>
<th>Public policy</th>
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<tbody>
<tr>
<td>economic / social / environmental / health trends, local and national priorities, policies, programmes, projects</td>
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</table>

1.2.4 Planning emerged from the public health movement and in particular, the move to replace slums with well-designed cities and suburbs\(^6\). Rapid industrialisation during the nineteenth century required the need to overcome health problems related to slum housing areas such as overcrowding and poor sanitation. The Garden City movement of the early 20\(^{th}\) century was focused on providing healthier environments for people to live in and this heavily influenced the first planning legislation in 1909\(^8\).

1.2.5 The following extract from Barton and Tsourou (2000) Healthy Urban Planning gives an overview of the impact which urban planning and the physical environment can have in relation to the socio-economic categories of health as explained in Figure 1 and 2 of this report.

“Individual behaviour and lifestyle:
The physical environment, which is shaped by planning decisions, can facilitate or deter a healthy lifestyle. The propensity of people to walk, cycle or play in the open air is affected by the convenience, quality and safety of pedestrian and cycling routes and by the availability of local

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\(^6\) Scott-Samuel, Birley and Ardern (2001) *Merseyside guidelines for Health impact assessment*

\(^7\) Winters, L. *et al* (2010) *Top Tips for a Health Planned Environment*, LPHO, University of Liverpool

open space. This is critically important in relation to children, as a habit of healthy regular exercise is formed or not formed during childhood and lasts a lifetime. Regular exercise protects against heart disease and, can help to prevent the onset of obesity, consequently having the potential to reduce the onset of diabetes. Exercise is also shown to promote a sense of wellbeing, for example it can protect older people from depression.

Social and community influences:
Urban planning can act to destroy social networks, as in insensitive urban renewal schemes, or can conversely cultivate opportunities for a rich community life. Local community networks of support and friendships can be affected by the existence of common activities and meeting places; schools, post offices, pubs and convivial, safe streets. The sustenance of such local facilities and networks depends in part on coherent long-term strategies for housing, economic development and transport. Social support is particularly important for the most vulnerable groups. Moreover, for those who do not demonstrate strong and cohesive social support, are less likely to experience positive wellbeing, and will experience more depression, greater risk of pregnancy complications and higher levels of disability and chronic diseases. This does not mean that urban planning can create communities, but that planning affects the opportunities they have to choose.

Local structural conditions (Living and working conditions):
Planning policy very directly affects personal health in a number of ways. For example, the lack of sufficient housing of adequate quality can lead to housing stress and fuel poverty. This will affect health; accessible work opportunities (which can help alleviate poverty and depression and consequently the poor health caused by unemployment); and an accessible urban structure (efficient, inexpensive transport system can reduce problems or social exclusion and open up opportunities for poor and less mobile people).

General socioeconomic, cultural and environmental conditions:
At the broadest level of influence, local urban planning affects the quality of air, water and social recourses. It also affects the emission of green house gases, particularly in buildings and transport, and thus acts to exacerbate or mitigate the health risks of rapid climate change.”

Barton and Tsourou (2000)9

1.2.6 In March 2012, the Department for Communities and Local Government replaced Planning Policy Statements and Planning Policy Guidance notes with National

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Planning Policy Framework (NPPF). In order to reduce the wealth of guidance previously in place and encourage growth through a ‘presumption in favour of sustainable development’\(^\text{10}\)

1.2.7 The NPPF recognises the need to promote healthy communities and recognises the role of the planning system in creating:

“supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being”

1.2.8 When health determinants result in differences in levels of health which are unfair or unjust then ‘health inequalities’ are said to exist. The Marmot Report (2010), a major review of health inequalities in England, found that inequalities in health arise because of inequalities that exist in the conditions of daily life and the fundamental drivers that give rise to these health determinants. The Marmot Report recognised that links between health and the physical environment could be categorised as:

- Housing
- Access to Public Services
- Opportunities for Physical Activity
- Air Quality, Noise and Neighbourhood Amenity
- Accessibility and Transport
- Crime Reduction and Community Safety
- Access to Healthy Food
- Access to Work and Impact of Unemployment and Low Incomes
- Social Cohesion and Social Capital
- Resource Minimisation
- Climate Change
- Fuel Poverty

1.2.9 This Health Impact Assessment will use information from the Health Urban Development Unit Checklist ‘Watch out for Health’\(^\text{11}\) to explore these issues in relation to the Knowsley Local Plan: Core Strategy Proposed Submission Document.

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\(^{10}\) National Planning Policy Framework (DCLG, 2012)

\(^{11}\) Watch out for health: A checklist for assessing the health impact of planning proposals (NHS London Healthy Urban Development Unit, 2009)
1.3 Local Plan

1.3.1 The Local Plan is one or more documents containing the spatial planning strategy for a defined area.

1.3.2 Knowsley Council is in the process of preparing the Local Plan: Core Strategy. The following extract has been taken from the Proposed Submission Document which has been prepared as part of the ongoing process required to develop the Core Strategy.¹²

What is the Local Plan: Core Strategy?

1.2 The Knowsley Local Plan will comprise several documents. The Core Strategy part of the Local Plan will set the strategic framework for the growth and development of Knowsley up to 2028 and beyond. It sets out how and where new development and regeneration should take place and will therefore promote, guide and manage the future development of the Borough. The Core Strategy will also shape the investment plans of the Council and other public, voluntary and private sector organisations.

1.3 The Core Strategy will provide the strategic context for other planning policy documents, including other parts of the Local Plan (for which further detail is given in paragraphs 1.9 to 1.13).

What are we trying to achieve?

1.4 The Knowsley’s Sustainable Community Strategy (SCS)¹³ aims to make Knowsley “The Borough of Choice”, with a sustainable and diverse population, living in successful suburban townships that provide a sense of place and community. The SCS vision 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 This vision will be achieved through the actions of the Council and the wider Knowsley Partnership, linked to key outcomes. The Knowsley Local

¹² Knowsley Local Plan: Core Strategy Proposed Submission Document (Knowsley MBC, 2012) page 1
Plan will set out how the Borough will develop spatially in the short, medium and longer terms to deliver these aspirations.

*(Extract ends)*

**Structure of Knowsley's Local Plan**

Knowsley's Core Strategy will be supported by other documents within Knowsley's Local Plan:

- **The Local Plan: Site Allocations and Development Policies Document** will identify proposed site allocations for new housing, employment and other development. Where the Core Strategy identifies broad locations and distribution of development, the Site Allocations and Development Policies document will define individual development sites, by reference to the Local Plan Proposals Map. This document will also contain further detailed policies that will be used when determining planning applications.

- The Joint Merseyside and Halton Waste Local Plan has been prepared by Merseyside Environmental Advisory Service for Halton, Knowsley, Liverpool, Sefton, St Helens and Wirral Councils and sets out the planning strategy for the sustainable management of waste across the sub region. It includes site allocations for waste management uses and will be a part of each district's Local Plan.

- **The Local Plan Proposals Map** will be maintained as a separate document and will set out, on an Ordnance Survey map base, site allocations and land designations covering the whole Borough. The map will be updated as appropriate.

- The Council is also preparing various **Supplementary Planning Documents** (SPDs) to provide further detail where necessary on the policies set out in the Core Strategy and other parts of the Local Plan.

- An additional type of planning policy document available for use is the Neighbourhood Plan. These plans must be community-led, and can provide additional planning policies for specific areas within the Borough.

- **A Monitoring Report** (Authorities' Monitoring Report or AMR) is published by the Council in December each year to assess progress in addressing the key economic, social and environmental issues facing Knowsley, as well as the performance and effectiveness of adopted planning policies.

- A number of **evidence base** studies and technical reports have been completed to inform Knowsley's Local Plan. These are referred to and relied upon throughout this document, and a comprehensive list of relevant

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14 Knowsley Local Plan: Core Strategy Proposed Submission Document (Knowsley MBC, 2012)
publications and studies which make up the evidence base is available on the Council’s website.

Further information on the documents which will make up Knowsley’s Local Plan and timescales for their production can be found in the Council’s Local Development Scheme (LDS) which can be viewed on the Council’s website.

**Vision and Objectives**

1.3.3 The Vision and Objectives of the Core Strategy are set out below to provide an introduction for readers into the overall aims of the document.

1.3.4 The Vision is set out as follows:

**Spatial Vision - Knowsley in 2028**

By 2028, Knowsley Borough will be known for its successful suburban townships that provide a sense of place and community, having sustainable, diverse, more prosperous and healthy populations.

Knowsley’s economy will be stronger and more diverse, providing employment choices for local people and helping to drive economic growth in the wider Liverpool City Region. Knowsley will be attractive for businesses to invest in, providing a range of employment land and premises to meet their needs. The new Learning Centres coupled with investment in primary schools, adult training and skills initiatives, will raise educational attainment, skills and aspiration levels, so Knowsley’s people can access a wider range of jobs and better meet the needs of employers.

Knowsley will provide a wide choice of housing to meet needs. Residents will be attracted to the housing on offer and the vibrant, safe and cohesive communities of which it forms part. Housing renewal projects in Kirkby, North Huyton and Stockbridge Village will be successfully completed. New housing will be provided in sustainable locations, and be well designed, affordable and form attractive and identifiable neighbourhoods where residents will choose to live.

Kirkby, Prescot and Huyton Town Centres will have defined and enhanced roles, be regenerated, vibrant and welcoming, providing focal points where local residents will choose to shop and access health care, cultural and other key services and facilities. The district centres of Halewood and Stockbridge Village will be renewed and thriving, serving as centres providing local shops and services for those communities.

Knowsley’s communities will be better connected to local employment opportunities, health care, education, shopping, leisure and recreation provision. Land uses and transport will be well co-ordinated to allow Knowsley’s residents, workers and visitors to choose more sustainable forms of transport, including public transport, walking and cycling.
The gap in deprivation levels will be narrowed, both between different parts of the Borough and between Knowsley and elsewhere, with opportunity married with need. Areas of high social and economic deprivation, including Kirkby, North Huyton and Stockbridge Village, will have been transformed into distinctive places where people will choose to live, in vibrant, safe and cohesive communities.

Knowsley’s open spaces and indoor and outdoor sporting, recreation and leisure opportunities will be enhanced so that residents and visitors can choose to become more active and pursue healthier lifestyles. Open spaces will become well-used multi-functional areas incorporating attractive walking and cycling links between homes and destinations, and complementing the wider environmental benefits of the Green Infrastructure network, which assist the response to the impacts of climate change.

The character and quality of Knowsley’s rural villages of Cronton, Tarbock and Knowsley Village will be protected. Rural areas will provide distinct breaks between urban areas, and good public access for informal countryside recreation and opportunities for formal recreation.

Knowsley’s areas of environmental importance, including sites of biodiversity and geological value, together with buildings, structures and areas of historic and cultural importance will be protected, managed and enhanced, to ensure a positive contribution to Knowsley’s environmental quality and distinctiveness.

1.3.5 Chapter 3 of the Core Strategy proposed Submission Document sets out Strategic Objectives which the Strategy will aim to achieve over the plan period to 2028. These are provided to set the context for all proposed policies within the Core Strategy and wider Local Plan.

**Sustainable Economic and Employment Growth**
To encourage and maintain sustainable economic and employment growth in Knowsley, complementary to that within the wider Liverpool City Region, by accommodating employment related development, improving skills within the workforce, and promoting enterprise, entrepreneurship and innovation.

**Well-Balanced Housing Market**
To promote a well-balanced housing market throughout Knowsley by providing a sufficient quantity and mix of high quality sustainable housing in appropriate locations to meet needs and demand (including for market, affordable and supported housing).

**Regenerate and Transform**
To regenerate and transform areas of social and economic deprivation so they become more sustainable, safer, healthier and more cohesive communities, hence narrowing the gap between the richest and poorest communities in Knowsley.
Distinctive, Viable and Sustainable Town Centres
To promote distinctive, viable and sustainable town centres in Huyton, Kirkby and Prescot, by improving choice, variety and quality in their range of retail, leisure and other town centre uses, together with thriving district centres, including enhancement of those in Halewood and Stockbridge Village, and a more sustainable pattern of local centres.

Quality of Place
To promote the quality of place within Knowsley by protecting historically important features and enhancing the character, quality and diversity of Knowsley’s built environment, including town centres, key employment areas, residential neighbourhoods, green spaces, conservation areas, rural areas and villages, key gateways and transport routes.

Sustainable Transport
To ensure new development in Knowsley encourages a reduction in the overall need to travel, and prioritises sustainable transport such as walking, cycling and public transport. This will help to ensure accessibility and linkage between housing areas and employment locations, shopping, leisure, culture, health care, education, community and sporting facilities, green spaces and other services.

Manage Environmental Resources
To manage environmental resources in Knowsley prudently by focusing on sustainable development, recycling and renewable technologies, minimising pollution, reducing carbon emissions and responding to the impacts of climate change.

Green Infrastructure and Rural Areas
To support and strengthen the role of Knowsley’s Green Infrastructure (in rural and urban areas), promote biodiversity, and maintain the character of rural settlements including Cronton, Tarbock and Knowsley Village.

Promoting Health and Wellbeing in Knowsley
To address existing health inequalities and encourage enhancements to the health and wellbeing of Knowsley’s residents by ensuring a health promoting environment and provision of healthy lifestyle options for those living and working in the Borough.

1.3.6 The ninth Strategic Objective, promoting health and wellbeing, was not included as a specific objective in the previous version of the Core Strategy because it was seen as a cross cutting theme running through the other objectives. The objective was therefore not considered in the initial Health Impact Assessment.\textsuperscript{15} The new objective was included in the Proposed Submission Document version of the Core

\textsuperscript{15} Health Impact Assessment of Local Development Framework: Core Strategy Preferred Options Report (Knowsley MBC and NHS Knowsley, 2011)
Strategy because it was recognised that health and wellbeing should have greater prominence, as the other objectives will seek to contribute to the health and wellbeing of the Borough’s residents and workforce. This will be achieved through improved access to high quality, sustainable and well designed housing, employment opportunities, open space, services and facilities, and by prioritising sustainable transport modes like walking and cycling. In addition it will maintain the existing and create new opportunities for physical activity associated with sport, recreation, and supporting community involvement, cohesion, cultural activities and self-improvement. These will all help to improve health and wellbeing within Knowsley.

1.3.7 Figure 3 gives a list of the Proposed Submission policies.

| Figure 3: Core Strategy Proposed Submission Document – Structure |
|---|---|---|
| Section | Chapter | Contents (policy references in bold) |
| 1 | Introduction | 1. Introduction |
| | | n/a |
| | 2. Knowsley – The Place | n/a |
| 2 | Vision and Strategy | 3. Vision and Objectives |
| | | Spatial Vision, Strategic Objectives (1 to 8) and Cross-cutting Themes |
| | 4. Sustainable Development | SD1: Sustainable Development |
| | 5. Spatial Strategy | CS1: Spatial Strategy for Knowsley |
| | | CS2: Development Principles |
| | | CS3: Housing Supply, Delivery and Distribution |
| | | CS4: Economy and Employment |
| | | CS5: Green Belt |
| | | CS6: Town Centres and Retail Strategy |
| | | CS7: Transport Networks |
| | | CS8: Green Infrastructure |
| 3 | Area Priorities | 6. Area Priorities |
| | | Area Priorities for Huyton and Stockbridge Village |
| | | CS9: Principal Regeneration Area - North Huyton and Stockbridge Village |
| | | Area Priorities for Kirkby |
| | | CS10: Principal Regeneration Area - Kirkby Town Centre |
| | | CS11: Principal Regeneration Area - Knowsley Industrial and Business Parks |
| | | CS12: Principal Regeneration Area - Tower Hill |
| | | Area Priorities for Prescot, Whiston, Cronton and Knowsley Village |
| | | CS13: Principal Regeneration Area - South Prescot |
| | | CS14: Principal Regeneration Area - Prescot Town Centre |
### Core Strategy Preparation

1.3.8 In order to complete the Core Strategy, a rigorous process of strategy development, development of the evidence base and consultation must be followed. An ‘Examination in Public’ must also be held in order to ensure that documents within the Local Plan can be legally adopted for use as a basis for the Council’s spatial planning and other related decisions.

1.3.9 The proposed timescales for the adoption of the Knowsley Local Plan Core Strategy are as follows with the current stage highlighted in bold:

- Production of the ‘Preferred Options’ stage of the Core Strategy – May 2011
- Public consultation on Core Strategy ‘Preferred Options’ report – June 2011
- **Publication of the Core Strategy ‘Proposed Submission Document’** – November 2012
- Submission of the Core Strategy to the Secretary of State – February 2013
- Examination in Public of Core Strategy begins – June 2013
- Council formally adopts the Core Strategy – December 2013
The later dates may be subject to change.

**Importance of the Current Stage**

1.3.10 The current stage of the Core Strategy involves preparing and consulting on the Proposed Submission Document. This involves the Council producing the plan that it proposes to submit to the Secretary of State. Consultation on this stage is in relation to the "soundness" and "legal compliance" of the plan only. All valid representations received will be submitted to the Secretary of State with this document. The Secretary of State will appoint an independent inspector to conduct a public examination of the Council’s proposals taking into account the representations made.
1.4 Health Impact Assessment

1.4.1 Health Impact Assessment (HIA) has been defined as “The estimation of the effects of a specified action on the health of a defined population” (Scott-Samuel, 1998)\(^\text{16}\). The action may be a project (for example, a housing development), a programme (for example, a public safety programme) or a policy (for example the introduction of water metering).

1.4.2 HIA is based on the socio-economic model of health, as demonstrated in Figures 1 and 2 at the beginning of this document, and is intended to produce a set of evidence-based recommendations to inform and influence decision-making. HIA seeks to maximise the positive health impacts of any proposal and minimise (or eliminate) the negative health impacts.

1.4.3 The benefits of using the HIA model include:
- helping to deliver corporate responsibility, for example, delivering ‘A Healthy, Independent Knowsley’ is a key objective of the Borough\(^\text{17}\);
- providing an opportunity to increase stakeholder participation, and therefore overall support for the proposal;
- contributing to the sustainability of a proposal;
- Concentrating delivery of services where there is most need.
- adding value by minimising the risk of future costly mistakes; and
- supporting the progression of certain policies or developments.

1.4.4 A HIA should ideally be conducted at an early stage within the development of a proposal in order to ensure maximum opportunity to influence decision-making and subsequent health impacts. HIA can also be carried out concurrently (during implementation) or retrospectively (after implementation) but the latter would have limitations on the degree of influence.

1.4.5. The HIA process is designed to be practical and sufficiently flexible to be adapted to a range of circumstances. HIAs can vary in terms of timescale and scope depending on the resources available. Recognised types of HIA include:
- Desk-top – Short, desk-based exercise requiring no stakeholder engagement
- Rapid – More detailed exercise involving the use of secondary data and community engagement
- Comprehensive – Very detailed exercise usually taking 6 months plus, involving extensive engagement and consultation.

1.4.6 Recognised stages to be followed in undertaking HIA, illustrated in Figure 4:
- **Screening** – short process to determine if a HIA is required.

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\(^{17}\) Knowsley MBC (2008), ‘Knowsley Sustainable Community Strategy’
• **Scoping** – establish steering group, Terms of Reference, size and parameters of the HIA.

• **Conducting assessment** – prepare background information including policy analysis and health profile of affected communities, collect qualitative and quantitative data through consultation and literature review, analyse impacts, establish priorities and develop recommendations.

• **Producing report and action plan** – set out approach, methodology, conclusions and recommendations arising from the HIA.

• **Monitoring** – steering group to monitor and record changes as a result of the action plan over a defined period of time.

• **Evaluation** – evaluate influence of the action plan on the proposal and on the predicted impacts (outcomes) and update HIA report accordingly. Lessons learnt to be taken forward for use in future HIAs.

1.4.7 HIA is evidence-based and a significant part of all HIAs involves the collection of supporting evidence from a variety of sources. Policy analysis details relevant published government policy, best practice and available research in relation to the subject area. Profiling of communities involves assessing population based evidence in relation to the local community affected by a proposal.

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1.4.8 Data collection generally refers to the consultation elements of the HIA and should utilise the experience and expertise of a wide range of stakeholders in order to collect primary qualitative and quantitative data about a proposal. Importantly this stage should be used to enhance confidence in the findings of the HIA by ensuring that recommendations are locally relevant and by recognising local opinions, experiences and expectations of those people most directly affected by the action being scrutinised.

**Core Strategy HIA Methodology**

1.4.9 The links between health and spatial planning are explored within Section 1.2 of this report. Given the significance of the Core Strategy and Local Plan as a whole on the spatial planning process within Knowsley, it was felt that the possibility of undertaking a Health Impact Assessment should be explored. This would aim to ensure that the policies contained within the Core Strategy have a positive impact on the local population and any identified potential negatives impacts are mitigated against.

1.4.10 The need to explore the possibility of conducting a HIA was identified early within the development of the Core Strategy by Knowsley Council’s Local Plan Team. The ‘Preferred Options’ stage was seen to be the most appropriate time to undertake the initial HIA as the document would be progressed enough for detailed proposed policies to have been developed. However, changes could still be made where required. Given the importance of the Preferred Options Report in shaping the final Core Strategy, producing the initial HIA at this stage also enabled stakeholders to account for its findings in their own responses to the Preferred Options consultation. The Final HIA (this report) was then undertaken on the Proposed Submission Document in late 2012, to take account of any changes made during consultation and as a result of the recommendations in the Interim HIA.

**Screening**

1.4.11 A small steering group was established in early 2011 to take forward the initial HIA and included members of the Knowsley Local Plan Team and the Health and Regeneration Officer for Knowsley Council and NHS Knowsley.

1.4.12 The steering group began the HIA process by undertaking a short screening exercise based on Knowsley Council’s Integrated Impact Assessment (IIA) toolkit. The toolkit is designed to screen all projects, policies and programmes, using a series of questions relating to both sustainability and health outcomes. Areas where there are potential positive, neutral or negative impacts of a proposal are highlighted through the process.
1.4.16 Although the IIA indicates that the Core Strategy at Preferred Options stage would have a largely positive impact on the health of the local population, and relatively few potential negative impacts, the steering group still felt that the significance of the document and time-frame for its implementation necessitated further HIA work in the form of an Interim and then Final HIA. The approach taken to this work is outlined in the following paragraphs.

**Scoping**

1.4.17 The process of scoping is designed to set the size, parameters and therefore type of HIA, based on what is practical and achievable within the timescale and resources available.

1.4.18 The Core Strategy contained 27 policies\(^\text{19}\) covering various aspects of land-use planning. The policies were divided up into categories as follows.

- **CS1 – 8 Spatial Strategy** – Overarching policies relating to the broad themes of the Core Strategy,
- **CS9 – 14 Principal Regeneration Areas** – Area specific policies relating to regeneration areas within the Borough,
- **CS15 – 18 Balancing the Housing Market** – Specific policies relating to future housing policy within the Borough,
- **CS19 – 21 Promoting Quality of Place** – Policies relating to the design of new development, management of heritage and greenspace within the Borough,
- **CS22 – 26 Caring for Knowsley** – Policies relating to resource management and mitigation against climate change,
- **CS27 Infrastructure Planning and Development Requirements.**

1.4.19 Following discussion with the steering group and investigation into approaches taken by other authorities; it was felt that it would not be feasible to undertake the HIA on each individual policy due to timescale/complexity. An alternative approach was therefore explored. Upon review of the available evidence and general best practice around the consideration of health within the planning system, a document produced by the Healthy Urban Development Unit (HUDU) called ‘Watch out for Health’\(^\text{20}\) was identified. This document was funded by NHS Primary Health Care Trusts across London, and pulls together a variety of evidence around the positive and potential negatives impacts which planning can have on human health. The document identifies the direct and indirect aspects where planning may influence health:

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\(^{19}\) Since the preferred Options Report, the Core Strategy has introduced an additional policy - SD1 (Sustainable Development). The National Planning Policy Framework (NPPF) requires that a presumption in favour of sustainable development be central to both plan-making and decision-taking. Policy SD1 was introduced to reflect the commitment to this approach within Knowsley’s Local Plan. It was not considered as part of the Interim HIA. It has, however, been considered as part of this Final HIA.

• Direct impacts (or influences) on health;
  o Housing
  o Access to public services
  o Opportunities for physical activity
  o Air quality, noise and neighbourhood amenity
  o Accessibility and transport

• Indirect impacts (or influences) on health;
  o Crime reduction and community safety
  o Access to healthy food
  o Access to work
  o Social cohesion and social capital
  o Resource minimisation
  o Climate Change

1.4.20 It was therefore proposed that the interim HIA be based around these topic areas. The relevant policies relating to each of these topic areas was identified and used as a basis for discussion, along with additional information about local issues within Knowsley. Areas where the Core Strategy Preferred Options Report supported the national evidence were identified, along with areas where changes could potentially be made to ensure that the document had a more positive impact on human health.

**Producing the Interim and Final HIA Reports**

1.4.21 It is recognised that consultation is an important part of any HIA; however, given the large amount of people who could potentially be affected by the Core Strategy and the strategic nature and content of the document, the steering group felt that initial consultation as part of the HIA should be limited to internal officers from the Council and NHS. This was undertaken through two workshop sessions.

1.4.22 At these sessions an introduction to HIA and the Core Strategy was given, along with an explanation of how the analysis of each topic area from the HUDU Checklist would be considered. The group was then split into two break-out groups, each discussing a topic area from the HUDU Checklist.

1.4.23 For each topic area the groups were given a summary of the evidence from the HUDU Checklist, along with local evidence of need within Knowsley. The relevant policies from the Core Strategy were then listed to promote discussion and to identify where the evidence was reflected in the Core Strategy and if there were any gaps.

1.4.24 The steering group identified approximately 25 officers from across Knowsley Council and NHS Knowsley who represented all areas covered by the Core Strategy. All were invited to both sessions and the following 12 officers attended:
  - Health and Regeneration Officer, KMBC/KNHS - Cath Taylor – (HIA trained)
  - Senior Planner, Local Plan Team, KMBC – Rachel Apter
1.4.25 Once completed in draft form the Interim HIA report was e-mailed to all officers invited to attend the sessions, to allow those who could not make the sessions to comment. Suggested changes were incorporated into the document.

1.4.26 In Summer 2011, the report was published for public consultation alongside the Core Strategy Preferred Options Report, making it available for comments from local stakeholders to review in considering their response to the Preferred Options Report. Comments were also received in relation to the Interim HIA itself and, although limited, were very positive.

1.4.27 Since the Preferred Options consultation, the Core Strategy has been redrafted into the proposed Submission Document. As part of this process Knowsley Council’s Local Plan team have been able to consider the recommendations made in the Interim HIA together with other reports and evidence such as the findings of the Sustainability Appraisal and Habitats Regulations Assessment processes. This process has been documented in a separately published document, “Accounting for Assessments”, which sets out how the Council considered and responded to the recommendations of a range of Interim Assessments undertaken at the Preferred Options stage.

1.4.28 This document is the Final HIA of the Knowsley Local Plan: Core Strategy Proposed Submission Document. It should be noted that it does not cover Policies CS9 – 14 as they are area specific and largely reinforce the other overarching policies within the Core Strategy. In addition, any large regeneration schemes within the Borough (as identified in the policies) would also be expected to have undertaken a separate Health Impact Assessment during the planning process.

1.4.29 For completeness this Final HIA report has also been shared and approved by the Council and NHS officers mentioned above who attended the initial consultation sessions.
Geographical area

1.4.30 In terms of geography, the Core Strategy will cover the entire Borough and therefore has potential to impact on all Knowsley residents, those living in adjacent areas and those who travel to or through the Borough for work or leisure purposes. This has been taken into account during the HIA.

1.4.31 Given the parameters and considerations mentioned above, it was therefore concluded that the HIA to be undertaken on the Core Strategy should be a rapid HIA.

Limitations to this HIA

1.4.32 Limitations to this HIA are:
   - due to the size of the Core Strategy (approximately 200 pages), time and resources were not available to appraise every aspect of the document. Rather, a general approach, using the evidence supplied within the HUDU Checklist and cross-referencing this with relevant policy was taken. This was considered to be the best way to undertake the HIA given the time and resources available; and
   - the strategic nature of the document and numbers of people potentially affected by the Core Strategy make consultation with all relevant stakeholders impractical. Initial consultation on this document has been limited to internal officers from the Council and NHS. It will be available to view as part of a range of supporting documents published to support the consultation on the Local Plan: Core Strategy Submission Document in November 2012.

Links to other assessments

1.4.33 There are several other assessments which have been undertaken on the Core Strategy. These following assessments will interlink with the HIA.

   - **Sustainability Appraisal (SA)** - The SA identifies impact of development by using 17 objectives that appraise social, environmental and economic impacts. Almost all of the SA objectives have links to the social determinants of health. As such the SA incorporates many aspects of the HIA during its appraisal of the policies contained within the proposed Submission Document. The SA also includes requirements of the European Regulations related to Strategic Environmental Assessment.  

   - **Habitats Regulation Assessment (HRA)** - The HRA assesses the impacts of the strategy on “European Sites” identified as important for habitat protection. Although Knowsley does not contain any such sites, there are several in

surrounding districts (e.g. the Mersey Estuary and Sefton Coast) which could be affected by development in the Borough. The HRA also includes the requirements of the European Regulations related to habitats protection 22.

• **Equality Impact Assessment (EqIA)** - The Council are required to undertake an EqIA for Council policies by the Equality Act 2010. The assessment is a tool for identifying impacts on the people in the community and is based on the needs of the groups that make up the different equality groups, based on age, race, gender, sexual orientation, gender reassignment, pregnancy and maternity, religion and belief and social deprivation. Some of the needs of these groups relate to issues considered in the HIA, and therefore appropriate links have been made between these two documents.

• **Joint Strategic Needs Assessment (JSNA)** – The JSNA is produced by a partnership between the primary care trust and local authority. The assessment seeks to identify the current and future health and wellbeing needs of the Borough’s population. This information is used to inform the local area agreement and agreed commissioning priorities that seek to reduce health inequalities and improve health outcomes. The JSNA provides evidence of what and where the health inequalities and issues are that affect Knowsley and what the local priorities are for health. The JSNA will be used as evidence around local health requirements for the area.

22 European Union Habitats Directive 92/43/EEC
1.5 Profile of Knowsley

1.5.1 The following information has been taken from the proposed Core Strategy Submission Document: Chapter 2, giving an overview of the Knowsley area.

"Liverpool City Region Context"
Knowsley is part of the Merseyside conurbation, between the city of Liverpool to the west and St. Helens to the east. Sefton and West Lancashire districts lie to the north while Halton district lies to the south. These areas functionally form part of the wider Liverpool City Region.

Knowsley forms part of the Liverpool City Region's Northern Housing Market Area\(^{23}\). It also plays a major role as a location for employment, and recreational opportunities within the City Region. It has good transport links, particularly in an east-west direction to Liverpool City Centre, the Port of Liverpool, Liverpool John Lennon Airport, Manchester, and the wider national motorway and rail networks. The Borough has very high levels of commuting to and from the surrounding area, particularly Liverpool.

Knowsley is in a position to contribute to and benefit from the City Region's economic initiatives and opportunities such as Atlantic Gateway\(^{24}\) including the Liverpool SuperPort concept\(^{25}\). Liverpool John Lennon Airport's expansion plans would be advantageous for future economic investment in the Borough, particularly in freight or passenger transport related services\(^{26}\).

Settlement Pattern and Local Context
Knowsley comprises a belt of large suburban towns, villages and open areas. Most residents live in the suburban towns of Huyton, Kirkby, Prescot, Whiston and Halewood. The majority of development in these towns date from the 1920s onwards, with much of the growth resulting from "overspill" development from the City of Liverpool. The exceptions to this include the older historic town of Prescot and a few pockets of older development in the other towns. The suburban housing areas are served by town and/or district centres providing a range of mainly local shopping and other services.

The Borough contains a number of large industrial and business parks which play a crucial economic role in the City Region. These include the very large Knowsley Industrial Park and Business Park (in Kirkby), the Jaguar Land Rover car plant (in Halewood), and Kings, Huyton and Prescot Business Parks in the

\(^{23}\) The Liverpool City Region Housing Strategy (TMP, 2007) defines three housing market areas, one of which – the Northern Market Area - includes Knowsley, Liverpool, Sefton and Wirral

\(^{24}\) see Atlantic Gateway website at www.atlanticgateway.co.uk

\(^{25}\) The Liverpool SuperPort concept will strengthen the City's role as a major international gateway by ensuring that its air, port, logistics and transportation assets are developed in a coordinated way – see http://www.liverpoollep.org/priorities/superport.aspx for further details

\(^{26}\) Liverpool John Lennon Airport Master Plan to 2030 (Liverpool John Lennon Airport, 2007)
central belt of the Borough. Whiston Hospital is another major employer of sub-regional significance. The employment and housing areas of the Borough are generally highly segregated.

The countryside and urban fringe areas of the Borough are designated as Green Belt, much of which is high grade farmland, and within which the attractive villages of Knowsley, Cronton and Tarbock are located. Knowsley Safari Park (located within the historic Knowsley Hall Estate) represents a unique tourism facility, receiving over 500,000 visitors per year, while the National Wildflower Centre at Roby (Huyton) constitutes a further significant cultural asset for the Borough.

Knowsley’s local context, including key transport links, town centres, the extent of urban areas and areas designated as Green Belt (as at 2012), is illustrated on Map 2.2 ‘Knowsley Local Context as at 2012’.
Knowsley’s Population

During the 1970s and 1980s, a loss of manufacturing jobs in the Knowsley area left thousands of local people facing unemployment. This, coupled with a relatively poor choice of housing to buy, contributed to a population decline of nearly 40,000 between 1971 and 1991\textsuperscript{27}. To address the decline in population the Council embarked upon an ambitious “stabilisation strategy” in 1991. This resulted in a relative stabilisation of population since 2000. In March 2011, Knowsley’s population was estimated to be 149,230\textsuperscript{28}. The 2011 Census, however, suggests that the population was 145,900. National projections indicate that the Borough’s population will increase by about 4,000 between 2008 and 2028\textsuperscript{29}.

Knowsley’s population structure is an ageing one, with the number of persons aged under 65 projected to decrease by 4,600 between 2008 and 2028\textsuperscript{30}, while those aged 65 and over is projected to increase by 8,600.

Deprivation in Knowsley

Despite significant progress in recent years, Knowsley is ranked the fifth most deprived district in the country\textsuperscript{31}. The distribution of deprived areas is shown on Map 2.3 ‘Deprivation in Knowsley 2010’. The most deprived areas of the Borough are in Kirkby, Stockbridge Village and North Huyton, although smaller pockets of deprivation exist in other areas.

Knowsley has high levels of worklessness. In March 2012, 6.9% of the residents of working age were claiming Job Seeker’s Allowance, many on a long term basis\textsuperscript{32}. The levels of claimants of Incapacity Benefit or Severe Disability Allowance is also high.

Educational attainment levels in Knowsley are low. In 2010/11, 40.5% of pupils achieved 5 or more A*-C grades at the end of Key Stage 4, compared to 58.3% in England\textsuperscript{33}. The level of educational attainment for boys is particularly low. Knowsley has the fourth highest proportion of 16 to 18 year olds that are not in education, employment or training (also referred to as "NEET"). Educational attainment remains a priority for the Council and its partners. The Future Schools programme has replaced eleven secondary schools with seven new Centres for Learning, while primary schools have a programme of rationalisation and investment.

\textsuperscript{27} ONS Mid-year Population Estimates (ONS, various)
\textsuperscript{29} 2008-based Sub-national Population Projections (ONS, 2010)
\textsuperscript{30} 2008-based Sub-national Population Projections (ONS, 2010)
\textsuperscript{31} Index of Multiple Deprivation 2010 (Rank of Super Output Area score measure) (CLG, 2011)
\textsuperscript{32} Claimant Count - Age and Duration (ONS from Nomis, 23 July 2012)
\textsuperscript{33} Knowsley Annual Monitoring Report 2011 (Knowsley MBC, 2011)
The Council and its partners have taken action to tackle deprivation, for example, by remodelling housing areas in North Huyton through the Revive programme. A similar, but smaller scale, regeneration project is proposed in Tower Hill (Kirkby) although the start of development has been delayed by difficulties in the housing market. The Council is also reviewing opportunities to carry out appropriate regeneration projects to remodel housing areas in other deprived parts of the Borough, for example, Stockbridge Village.

See the North Huyton Action Area SPD (Knowsley MBC, 2007) for further details
See the Tower Hill (Kirkby) SPD (Knowsley MBC, 2007) for further details
Health and Wellbeing

Although life expectancy levels have increased, the Borough’s levels (75.9 years for males and 79.8 for females) are still among the lowest in the country\footnote{Area Partnership Boards Health Profiles 2011 (Knowsley Public Health Intelligence and Evidence Team, 2011)}. The Borough has high mortality rates from cancer (particularly lung cancer), cardiovascular disease (including coronary heart disease and stroke) and respiratory disease. These are issues which can be associated with lifestyle choices such as smoking, alcohol consumption and diet\footnote{Public Health Annual Report 2010 (Knowsley Primary Care Trust, 2010)}, but also with wider environmental factors such as housing standards, quality of employment opportunities, access to health and other services/facilities, open space and the natural environment."

(Extract from proposed Core Strategy Submission Document ends)\footnote{Knowsley MBC (June, 2011) Knowsley Council Preferred Options Report, KMBC}

Additional Health Issues within Knowsley

1.5.2 The following section provides some more specific health information in relation to the Knowsley area. The majority of the information is sourced from the Knowsley Public Health Annual Report: Statistics Compendium 2010\footnote{Knowsley Public Health Team (2011) Public Health Annual Report: Statistics Compendium 2010, NHS Knowsley}, unless otherwise stated.

Child Health

1.5.3 Fertility Rate: Based on 2007-2009 figures, the rate of live births per 1000 females aged 15 – 44 in Knowsley is 60.2, which is below figures for the North West (63.1) and England (63.31).

1.5.4 Low Birth Weight: Birth weight is measured to identify those children most at risk of dying young or suffering health problems. Those weighing less than 2,500g are classified as having a low birth weight. 8.4% of babies born in Knowsley were classified as low birth weight based on 2007-2009 figures. This is slightly higher than both the North West and England figures of 7.3%.

1.5.5 Childhood Obesity: Based on data for the period 2007/8 to 9/10, childhood obesity rates for reception year children in Knowsley were 11.9%, higher than the Northwest and England figures which were 9.9 and 9.8% respectively. Childhood obesity rates for the same period for Year 6 children were 22.5%, higher than the Northwest and England figures which were 18.8% and 18.5% respectively.
Mortality

1.5.7 Mortality rates for a range of causes in Knowsley are shown in Figure 6. These figures are based on all ages and are expressed as a rate per 100,000 resident population.

*Figure 6: Comparison of mortality rates in the England, the North West and Knowsley*

<table>
<thead>
<tr>
<th>Mortality rates (per 100,000 resident population)</th>
<th>Knowsley</th>
<th>North west</th>
<th>England</th>
</tr>
</thead>
<tbody>
<tr>
<td>All causes</td>
<td>695.0</td>
<td>646.3</td>
<td>566.9</td>
</tr>
<tr>
<td>Cardiovascular disease</td>
<td>201.8</td>
<td>201.7</td>
<td>174.5</td>
</tr>
<tr>
<td>Cancer</td>
<td>214.5</td>
<td>188.1</td>
<td>171.7</td>
</tr>
<tr>
<td>Lung cancer</td>
<td>170.3</td>
<td>118.5</td>
<td>96.3</td>
</tr>
<tr>
<td>Respiratory disease</td>
<td>105.7</td>
<td>87.2</td>
<td>70.9</td>
</tr>
</tbody>
</table>

1.5.8 Figure 6 clearly shows that in all cases, Knowsley has higher or significantly higher levels of mortality than that occurring nationally and within the North West. In relation to lung cancer, levels are extremely high in Knowsley compared with the national and North West figures.

Lifestyles

1.5.9 **Smoking Prevalence:** In 2009, smoking prevalence in Knowsley was 24.1%, higher than the Merseyside wide average of 19.5% (figure for 2008).

1.5.10 **Alcohol:** There were 2,803 alcohol related harm hospital admissions per 100,000 population in Knowsley during 2009/10. This was significantly higher than the North West (2,300) and England (1,744). Since 2002/03, Knowsley has had a significantly higher level of alcohol related hospital admissions than the North West and England. However, the rate of increase of 75.8% in Knowsley has been lower than regionally (86.4%) and nationally (88.6%).

1.5.11 **Sedentary Lifestyle:** The proportion of adults undertaking three sessions of exercise a week which is of moderate intensity (or 12 sessions in the previous 28 days as asked in the survey) varies between 15.8% and 18.7% in Knowsley between 2007/08 and 2009/10. In comparison, the figures for the North West and England show a steady year on year rise and stand at 17.7% and 16.5% respectively in 2009/10.

1.5.12 **Adult Obesity:** Synthetic estimates of adult obesity in Knowsley have been calculated in 2010, (National Centre for Social Research, 2010), which suggested that prevalence of obesity within Knowsley is 23.4%, slightly lower than the Northwest (24.5%) and England levels (23.52%).
SECTION 2: ANALYSIS OF THE CORE STRATEGY

2.1 Introduction

2.1.1 This section uses information from the Health Urban Development Unit’s (HUDU) Checklist ‘Watch out for Health’ to ensure that health is fully considered through the Core Strategy. The checklist is not designed to raise concerns or problems associated with the Core Strategy but to articulate how problems might be resolved.

2.1.2 In relation to planning, the checklist recognises key direct impacts (or influences) on health as:
- Housing
- Access to public services
- Opportunities for physical activity
- Air quality, noise and neighbourhood amenity
- Accessibility and transport

2.1.3 The checklist recognises wider, indirect impacts (or influences) on health as:
- Crime reduction and community safety
- Access to healthy food
- Access to work
- Social cohesion and social capital
- Resource minimisation
- Climate Change

2.1.4 Evidence relating to each of the impacts is explored in relation to local context and need within Knowsley. An assessment is then made of the policies as to their positive or potential negative impact on the health of the Borough. Recommendations about potential ways to improve the Core Strategy are then given.

2.1.5 This section also considers the outcome of the recommendation made in the Interim Health Impact Assessment. Comments explaining the responses to each recommendation have been added within the following sections. These are colour coded as follows for ease of reading.

- Green – Changes made to the Core Strategy to address recommendation
- Amber – No changes made, and adequate reasons for this given
- Red – No changes made and issue still outstanding

2.1.6 Recommendations for further work are then identified in Grey.
2.1.7 Section 2.13 gives the overall conclusions of the HIA including a summary of the extent and nature of changes to the Core Strategy as a result of the HIA, and suggests any further work that is required going forward.
2.2 Housing

2.2.1 The following extract from the Healthy Urban Development Unit (HUDU) Checklist suggests the potential impact of planning on housing and health.

“Health Benefit

2.2.2 Access to decent and adequate housing is critically important, especially for the very young and very old in terms of health and wellbeing. Environmental factors, overcrowding and sanitation in buildings as well as unhealthy urban spaces have been widely recognised as causing illness since urban planning was formally introduced. Post-construction management also has impact on community welfare, cohesion and mental wellbeing.

Positive effects of planning

2.2.3 Making provision for affordable housing has the potential to improve wellbeing, while housing quality can be improved by use of appropriate construction methods. This includes use of good materials for noise insulation and energy-efficiency as well as detailed design considerations in making sure that homes are accessible, adaptable and well oriented. Such issues are emphasised in Building for Life (2008), an assessment process devised by the Commission for Architecture and the Built Environment (CABE). Providing a sufficient range of housing tenures with good basic services is also essential. Adaptable buildings for community uses such as health, education and leisure can contribute towards a sustainable community, while the provision of Lifetime Homes (as outlined in Code for Sustainable Homes) allows residents to remain in their home despite changing accommodation requirements. In this context, adaptable housing more easily permits care to be provided in the community.

Potential negative effects of planning

2.2.4 A lack of affordable housing within communities may compromise the health of low-income residents, as they are likely to spend more on housing costs and less on other health needs. Poor choice of location, design and orientation of housing developments can be detrimental to physical and mental health, housing that is overcrowded can also cause mental disorders, physical illness and accidents. Inappropriate buildings can also in some instances affect health and combined with social isolation can lead to depression. The quality of build including type of materials used also have the potential to contribute towards a number of health problems.”

(Extract ends)

Local context

2.2.5 In 2010, Knowsley contained approximately 64,570 dwellings. The number of households in Knowsley is projected to rise by about 7,000 between 2008 and 2028.
The average household size in the Borough is comparatively large with a high proportion containing dependent children and lone parent families. A very high proportion of Knowsley’s housing stock (over 30%) is social rented. The highest concentrations of social rented housing are within Kirkby and North Huyton.

**Local need**

2.2.6 Key issues in relation to housing within Knowsley include:
- how to meet the housing requirements of an increasing number of households;
- imbalance between needs/demands and supply in the housing market in terms of type, tenure, and size;
- major affordability issues across all sectors of the housing market;
- relatively slow rates of housing delivery in recent years and constrained land supply to meet longer term needs; and
- how to meet the accommodation needs of Gypsies, Travellers and Travelling Show people.

2.2.7 Key opportunities include:
- use planning policy to create a more balanced housing market which meets housing needs and demand;
- support actions to increase housing delivery in the future; and
- capitalisation on good transport links to Liverpool City Centre and other key employment areas.

2.2.8 Key issues in relation to housing and health are recognised within Knowsley’s Joint Strategic Needs Assessment as follows:
- continually rising fuel bills will mean that more households will be tipped back into Fuel Poverty.
- Knowsley has lower levels of owner occupation and higher than average social housing stock as a proportion of the total stock.
- good quality, affordable, safe housing is essential to our wellbeing. Non-decency in private sector is at 27.4% (12,550) which is lower than the national average of 35.8% for equivalent tenures.
- overcrowding and under-occupancy is considered a major issue in the Borough. Achieving the most efficient use of the current housing stock and addressing the needs of existing and new forming families in this sector is essential.
- issues regarding the ability of local people to afford housing within the Borough which is based on their level of income and their ability to access housing finance.
- there is predicted to be a significant increase in the population aged 65 years old plus. This increase in older householders will have implications for health and support services, extra care housing, and the long-term suitability of accommodation, equity release schemes, adaptations, and other age-related care requirements.
Relevant Policies

2.2.9 Policies relating to housing are located within several different places within the Core Strategy, as follows:

- **CS1 Spatial Strategy for Knowsley** (in part) sets out overarching proposals to re-balance the housing stock and regeneration existing residential neighbourhoods.
- **CS3 Housing Supply, Delivery and Distribution** sets out the general approach to new housing provision within the Borough including numbers, distribution, supply of available and tenure, size and density issues.
- **CS15 Affordable Housing** covers provision of affordable housing within sites and Section 106 contributions and partnership working with Registered Social Landlords.
- **CS16 Specialist and Supported Accommodation** sets guidance for the provision of specialist residential accommodation, e.g. for older or vulnerable people.
- **CS17 Housing Sizes and Design Standards** provides guidance about the mixture of housing sizes to be achieved in Knowsley, and design standards such as the Code for Sustainable Homes and Lifetime Homes.
- **CS18 Accommodation for Gypsies and Travellers and Travelling Showpeople** sets out guidance for the location and development of traveller sites within Knowsley.

Identification of impacts

2.2.10 Potential impacts in relation to each of the above policies are as follows:

**CS1 Spatial Strategy for Knowsley (in part)**

*Positive impacts:*

- This is a good statement of position and aspirations and is in line with local needs and evidence by recognising the need to re-balance the housing market, and provide a wider range of housing including affordable housing; and
- Continued investment in existing housing stock is also seen as a major positive, given the condition and design of some housing within the Borough.

*Potential negative impacts:*

None

*Recommendations:*

None
CS3: Housing Supply, Delivery and Distribution

Positive impact
- In line with local needs, this policy seeks to increase the numbers of houses built within Knowsley and ensure that a five-year supply of housing land is always available.
- The policy also recognises that the size, tenure and type of housing should reflect local population need, which is supported by evidence from the HUDU.

Potential negative impacts:
- This approach may result in the release of Green Belt land for housing which will potentially have significant health impacts in terms of reduction of and access to natural habitats (also dealt with in later section of this HIA).
- Where densities of higher or lower than 30 to 40 dwelling per hectare are accepted, there may be potential health issues to consider. Higher densities could lead to overcrowding and noise issues, whilst lower densities could lead to social isolation and the increased need to travel.
- Whilst the policy recognises that new housing should reflect the local population need, it should also recognise future population changes and changing aspirations of the local community and aim to attract new residents from elsewhere.

Recommendations:
- That a separate Health Impact Assessment be undertaken on all applications which fall outside the stated housing density parameters, where a residential scheme is for 15 units or more.
  **Comment:** Health Impact Assessment is already recognised in the Core Strategy as a tool to assess future development.
- Further recommendations: That criteria be set in guidance separate to the Core Strategy to govern where HIA would be applied.
- That planning and health colleagues work together to better understand the changing health and housing needs of the Borough, to allow planning for the future.
  **Comment:** Recommendation has been noted and further consultation with health and been and will continue to be ongoing.

CS15: Delivering Affordable Housing

Positive impacts:
- The Policy seeks to ensure that a proportion of new housing in sites of over 15 dwellings is delivered within affordable tenures. This is in line with evidence which suggests that affordable housing has the potential to improve wellbeing. The policy also puts in place measures to ensure that developers cannot easily avoid this requirement.
• The requirement of the policy to ensure affordable housing is not distinguishable between other housing on site will also help to encourage social integration.
• The commitment of the Council to continue working with Registered Providers of social housing to provide affordable housing using public sector funding is also vital, particularly during the current economic climate. Partnership working in this respect will ensure that investment is concentrated in areas of most need.

Potential negative impacts:
• 25% affordable housing may not be enough in some areas where more could be encouraged. Some affordable housing solutions (e.g. shared ownership) may still be unobtainable to those on low incomes, for example, the requirement of a deposit can be a major issue. The policy should therefore be open to new affordable housing products which may develop over time.
• That new housing areas delivered as a result of the Green Belt release may only be accessible for more affluent people.

Recommendations:
• That the supporting text for the Policy be re-phrased to try to encourage over the minimum of 25% affordable housing for market schemes. 
  Comment: No change made as the approach taken already is felt to be most appropriate and responds to evidence of housing need and demand and economic viability.
• That the Policy be open to encouraging new types of affordable housing products which may develop over time. 
  Comment: Supporting text has been altered to reflect this.
• That it be made clear that new housing sites, including those potentially made available as part of the Green Belt review and release, incorporate the same levels of affordable housing as other residential sites within the Borough. 
  Comment: Again, it is considered that this is already made clear within CS15.

CS 16: Specialist and Supported Accommodation

Positive impacts:
• The approach reflects best practice and deals with a major local issue by encouraging specialist housing or supported accommodation which is well located near to local amenities.
• The holistic approach in dealing with these issues is also welcomed.
• The Policy does mention making better use of current stock which is a positive, however. It is felt, however, that this could be enhanced through a statement supporting adaptation of current properties to ensure that people can remain in their homes rather than entering supported accommodation. This would be supported by evidence from best practice.

Potential negative impacts:
None
Recommendations:

- That where possible, it be specified that residents of specialist and supported living accommodation are included within the design of new buildings, therefore accounting for the needs and aspirations of older people, for example, scooter parking.
  
  Comment: An extra criterion has been added to CS16 to reflect this.

- That opportunities for re-modelling and re-fitting older people’s accommodation are maximised through wording of the Policy.
  
  Comment: It is felt that the supporting text for the policy already reflects this; therefore no change has been made.

- That the Policy is amended to capitalise on opportunities to align planning policies with health policies, e.g. care at home.
  
  Comment: The supporting text of CS16 has been amended to reflect this.

CS 17: Housing Sizes and Design Standards

Positive impacts:

- The Policy seeks to promote a mix of housing sizes. This is in line with the HUDU best practice.

- High quality design is also required through compliance with a number of standards such as Building for Life and Lifetime Homes, which are specifically mentioned by the HUDU as being important. These will help to ensure that homes are energy efficient; reduce potential issues such as fuel poverty and noise pollution. In addition, these standards will also help to ensure that homes are adaptable in order to suit the needs of the ageing population within Knowsley.

Potential negative impacts:

None

Recommendations:

- That the Policy should emphasise that good quality design should be given a high priority, to mitigate against examples of poor design within the Borough.
  
  Comment: It is felt that this is already reflected in numerous policies, including CS17 and CS19

- That provision of new housing which includes bungalows should be supported where appropriate within the Borough, including both affordable and market units.
  
  Comment: The supporting text for policy CS17 has been changed to emphasise this.

CS 18: Accommodation for Gypsies and Travellers and Travelling Showpeople
Positive impacts:
- This approach aims to ensure that accommodation is located in appropriate areas for a recognised disadvantaged group within society. The policy also seeks to ensure that any sites are as sustainable as possible, making reference for the need to be well located with easy access to local shops and facilities.
- Future management and maintenance of sites is considered in line with local evidence.

Potential negative impacts:
- Sites may be perceived as having a negative impact by surrounding communities, therefore leading to possible community cohesion issues which may negatively affect the wellbeing of all communities.

Recommendations:
- The Policy could be amended to highlight the opportunity presented by planning and health colleagues working together to tackle issues of social exclusion, and providing outreach and other services to the Gypsy and Traveller and Travelling Showpeople communities within the area.

Comment: The supporting text for CS18 has been amended to reflect this.

Additional comments
Positive impacts:
None

Potential negative impacts:
- The Core Strategy does not currently mention the need for effective post-construction management of housing which evidence suggests can help community cohesion, welfare and wellbeing, however, this is mentioned for Gypsy and Traveller and Travelling Showpeople accommodation.
- Poor management of housing can also lead to accidents within the home, and Knowsley currently has high numbers of accident characterised in this way, and this could be recognised within the Core Strategy.

Recommendations:
- Where appropriate the Core Strategy should make mention of the importance of post-construction management of all types of housing, not just for Gypsy and Traveller and Travelling Showpeople accommodation. This will help to manage accidents within the home.
Comment: Post-construction management has been mentioned as a policy requirement within CS19. However, this is only where appropriate, as post-construction management will not be relevant to all types of new development.

- That the Core Strategy also makes greater links to the Knowsley Housing Strategy currently under development.

Comment: The Housing Strategy has been mentioned in the supporting text for policy CS3

- That strong links between new residential development and greenspaces/communal areas should be made.

Comment: The Council considers that this is already achieved through policy CS21

Conclusions

2.2.11 The Interim HIA felt that the Core Strategy Preferred Options Report largely reflected the best practice given in the HUDU Checklist and therefore would have a positive overall impact on the population of the Borough, if implemented as stated. There were some opportunities to strengthen some of the policies through re-wording and consideration of additional issues such as post-construction management. The majority of these changes have been made within the proposed Submission document of the Core Strategy, and where these have not been made this has been adequately justified.

2.2.12 The Interim HIA also identified opportunities for further joint working between planning and health colleagues, to ensure that housing within the Borough meets the future needs of residents, and this has been noted.

2.2.13 The only additional recommendation added as a result of the final HIA is for criteria to be developed to govern where HIA would be applied to future housing sites and it is suggested that this would fall within guidance separate to the Core Strategy.
2.3 **Access to public services**

2.3.1 The following extract from the Healthy Urban Development Unit (HUDU) Checklist suggests the potential impact of planning on access to public services and health.

"Health benefits

2.3.2 In developing strong, vibrant, sustainable communities and promoting community cohesion, public services and infrastructure is required. The use of primary care and preventative health care services is dependent on a number of factors including physical access to health facilities and transportation. Provision and access to good quality public services not only in context of healthcare but also education and community facilities has a direct positive effect on human health. Opportunities for the community to participate in the planning of such services have the potential not only for positive effects on mental health and wellbeing but also can lead to greater community cohesion.

Positive effects of planning

2.3.3 By planning and providing for good local public services including configuration as well as establishment of multi-functional building that can accommodate a number of integrated public services, it is possible to provide better outcomes for health and wellbeing, reduce the need to travel as well as enhance social relationships within the community.

Potential negative impacts of planning

2.3.4 Failing to plan for different public service needs of an area leads to an unsustainable community. Under provision can contribute towards excessive travel, particularly for health, education, social and other local authority and central government services (damaging social cohesion and social capital). For those with mobility problems including the elderly, localised access to public services is vitally important, as public services located far away can cause significant problems not only in terms of accessing vital services but also in preventing opportunities for daily social interaction which could contribute to isolation and depression."

(Extract ends)

**Local context**

2.3.5 Kirkby, Prescot and Huyton Town Centres provide a broad range of services to distinct catchment areas associated with each. They are smaller than some centres in neighbouring districts, particularly Liverpool and St Helens. Kirkby and Huyton centres date largely from the 1950s and 1960s while Prescot contains a much older historic core with a large modern retail park to the south of the Town Centre. The Borough also contains smaller suburban district centres in Halewood, Stockbridge Village and Page Moss, and a network of smaller centres and parades providing valuable neighbourhood facilities.
2.3.6 Its is considered that Huyton, Prescot and especially Kirkby Town Centres are failing to perform well as locations for shopping, leisure and other town centre uses. They have very little in the way of an evening economy, having no cinemas or theatres, and a limited range of restaurants. They also suffer from high levels of "leakage" of shopping expenditure to other centres, particularly in Liverpool. Cables Retail Park in Prescot is, however, commercially successful. A number of smaller centres and parades in Knowsley are experiencing difficulties.

Local need

2.3.7 Key issues in relation to town centres within Knowsley include:
- High leakage of expenditure on comparison and convenience shopping to centres and "out of centre" retail parks outside Knowsley;
- Limited evening economy, cultural and family offer in Knowsley's centres; and
- Some local shopping centres and parades are commercially unattractive at present.

2.3.8 Key opportunities include:
- Support further town centre and retail development in Knowsley's town and district centres to meet identified local requirements and mitigate existing gaps in provision;
- Improve and enhance the cultural and leisure offer in Knowsley’s centres, including the night-time economy.

Relevant Policies

2.3.9 Policies relating to access to public services are located within several different places within the Core Strategy, as follows:
- **CS1 Spatial Strategy for Knowsley** (in part) covers overarching principles for the local of new development including a focus on existing centres and appropriate investment in service provision.
- **CS2 Development Principles** (in part) covers development principles including the provision of safe and sustainable access for all to services and facilities.
- **CS6 Town Centre and Retail Strategy** covers Knowsley’s hierarchy of centres, new comparison goods shopping, new convenience goods shopping and delivery and monitoring.
- **CS7 Transport Networks**

Identification of impacts

2.3.10 Potential impacts in relation to each of the above policies are:
CS1 Spatial Strategy for Knowsley (in part)

Positive impacts:
- Focusing development within existing urban areas and preserving the existing settlement pattern is important in creating accessible public services. This is therefore in line with HUDU evidence.

Potential negative impacts:
- New development of housing within the Green Belt has the potential to be isolated from public services.

Recommendations:
- Any new development of land within the Green Belt for housing should ensure that public services are accessible within reasonable distance by a range of transport modes, giving priority to walking and cycling.

Comment: The selection of locations within CS5 for development in the Green Belt has taken account of accessibility issues. Alongside CS17 on provision of infrastructure, this issue is addressed.

CS2 Development Principles (in part)

Positive impacts:
- By encouraging safe and sustainable access for all to a range of services and facilities, CS2 promotes good practice as highlighted by the HUDU. However, the policy wording could be strengthened to ensure that particular attention is given to accessibility by more vulnerable groups including the elderly and children.

Potential negative impacts:
None

Recommendations:
- That Policy CS2 is strengthened to ensure accessibility to public services for vulnerable groups is given appropriate consideration.

Comment: The Council considers it appropriate to promote access to public services for all; by definition, this includes vulnerable groups. Therefore no additions to the policy have been made.

CS4 Economy and Employment (in part)

Positive impacts:
- CS4 aims to concentrate new retail and town centre uses within existing centres, which will increase accessibility. This is in line with the HUDU guidance.
Potential negative impacts:
- After town centre sites, edge of centre and then out of centre sites may be considered for such uses. These may have potential negative health impacts as the less mobile may struggle to access these services and also employment opportunities provided by them. Previous examples of this sort of development within the Borough have led to similar access problems.

Recommendations:
- Any significant development being classified as edge or out of centre is subject to a separate Health Impact Assessment process. It is recognised that a process will have to be undertaken to define ‘significant development’, to ensure that the required HIAs are not too onerous for the development and case officers involved.
  
  **Comment:** Health Impact Assessment has already been recognised within the Core Strategy as a tool to assessment future development.
  
  **Further recommendations:** That criteria are set to govern where HIA would be applied to edge of centre or out of centre sites and this will fall within guidance separate to the Core Strategy.
- That CS4 be strengthened to recognise that the quality and connectivity of the retail environment is important to ensure that town centres are considered as a whole.
  
  **Comment:** This is not considered to be a strategic level issue, therefore no changes made.

**CS6 Town Centre and Retail Strategy**

Positive impacts:
- CS6 promotes the vitality and viability of existing town centres by promoting a mix of uses and not just retail.
- Provision of convenience retail provision, as outlined in CS6, is also seen as critical for the most deprived communities with the Borough.
- It is recognised that town centres are good for mental health and cultural life. They can also help to encourage entrepreneurial spirit.

Potential negative impacts:
None

Recommendations:
- Investigate the potential of the Core Strategy to strengthen the strategic approach to the retention and / or enhancement of local service provision, particularly small shops (i.e. convenience goods).
  
  **Comment:** It is considered that this level of detail is inappropriate to the Core Strategy therefore no changes have been made. It is the Council’s intention to save Policy S7 from the UDP to support in the aims of this recommendation.
That where the Council owns vacant shops (largely within neighbourhood centres and not town centres), pro-active ways to encourage the development of new businesses and services are considered.

*Comment:* It is considered that this level of detail is inappropriate to the Core Strategy therefore no changes have been made. It is therefore the Council’s intention to provide a more bespoke approach with regard to vacancy in local centres via the subsequent Local Plan: Site Allocations and Development Policies document.

*Further recommendations:* The Council could provide a more bespoke approach with regard to vacancy in local centres via the subsequent Local Plan: Site Allocations and Development Policies document.

**CS7 Transport Networks**

*Positive impacts:*
- CS7 re-iterated the need for new development to be located to prioritise accessibility via a range of travel modes and for large new development be located in the most accessible locations, which is a positive.
- Reference to cross-borough working is also made to enable accessibility across a wider footprint than Knowsley.

*Potential negative impacts:*
- Currently residents with limited mobility experience difficulty in accessing healthcare, for example hospitals, outside the Borough. There is currently no mention of this within the Core Strategy and re-wording of CS7 could help this.

*Recommendations:*
- That CS7 (i) is re-worded to state that the overall Transport Strategy will ‘Improve the health and wellbeing of local people, by encouraging physically active means of travel and providing access to adequate healthcare facilities’.

*Comment:* The Core Strategy states that it will “Ensure people can get to where they need to by a choice of walking, cycling and public transport”. This is considered sufficient to cover the above issues. More detail on these issues could be provided within the Ensuring Choice of Travel Supplementary Planning Document.

*Further recommendations:* More information relating to improving health and wellbeing of local people, by encouraging physically active means of travel and providing access to adequate healthcare facilities, to be included within revisions to the Ensuring Choice of Travel Supplementary Planning Document.

*Additional comments*

*Positive impacts:*
None
Potential negative impacts:

- There is little mention within the Core Strategy about encouraging positive night-time uses within Knowsley’s town centres. If worded carefully this could help to encourage increased social interaction and cultural activities. However, this also needs to be balanced within the potential negative implications of additional pubs, bars and eateries on increased alcohol consumption and the associated health and other problems with this (domestic violence and anti-social behaviour etc).

- In some areas, local centres are being increasingly dominated by takeaway food outlets which serve unhealthy food and often have a detrimental impact on the appearance of an area, for example, through poorly designed shop fronts and litter. Frequent consumption of unhealthy food, coupled with limited physical activity can lead to increased obesity. The Core Strategy currently makes no mention of policies to prevent the above occurring.

- There is a potential gap concerning references to schooling and health centres in the document as a whole.

- There is no mention of the importance of local communities in helping to shape service provision and delivery in their area.

Recommendations:

- Re-wording Policy CS6 to promote suitable night-time uses within Knowsley’s existing town centres, which will encourage social interaction and cultural activities.

  Comment: The Council agrees that there is a need for consistency in identifying support for enhancements to the evening economy across multiple policies. Additional wording has been provided in policy CS6.

- That additional work is undertaken and local evidence gathered around the issues relating to hot food takeaways within the Borough, and the opportunities to tackle this problem through the planning process are explored, dependent upon the outcome of the local evidence. It is recognised that this may be better addressed within a subsequent Local Plan document to the Core Strategy alongside other mechanisms, e.g. licensing restrictions.

  Comment: The Council considers that the level of detail required in this regard is not suitable to be provided in a document such as the Core Strategy, which has a strategic focus. It is therefore the Council’s intention to consider a more bespoke approach with regard to the suitability and function of different retail uses via the subsequent Local Plan: Site Allocations and Development Policies document and / or an additional SPD (if required).

- Links to the Borough wide Child Health Strategy could be made to highlight issues relating to access to public services for future generations.

  Comment: Noted. This has been referenced in the development of the IDP.

- Potential gaps in references to schooling and health centres within the wider document should be considered, including service provision and accessibility.

  Comment: This is considered within the scope of policy CS27 and the supporting IDP.
Greater flexibility about use of public buildings, for example schools, could be employed to ensure service delivery at a level accessible to communities. Opportunities should be taken to explore how to promote this through the Core Strategy, subsequent Local Plan documents and potentially other Council plans and strategies.

Comment: The detail of how public buildings are used is outside of the scope of the Core Strategy. However the Council already operates such strategies through the Future Schooling programme. This issue is mentioned in the IDP.

Conclusions

2.3.11 During the Interim HIA the workshop group noted that there had been failures in the past due to inaccessibility of services including health, retail, leisure and education within Knowsley. However, it was also recognised that in more recent years there had been good examples of local, accessible service provision, for example, within the Halewood Centre. It was also felt that this issue was critical to the success of the Local Plan and in general the Core Strategy Preferred Options Report encouraged accessible service provision.

2.3.12 The Interim HIA stated that more could be done to encourage suitable night-time uses within town centres in Knowsley, and also potentially to reduce the proliferation of takeaway food outlets. The importance of the community in helping to shape service provision could also be further emphasised within the Core Strategy. It was recognised that some of the recommendations from the Interim HIA may have been too detailed for the Core Strategy, and this is reflected in subsequent comments from the Policy, Impact & Intelligence Division which states where these recommendations could be better implemented. Further recommendations have therefore been added to ensure these are taken forward at the appropriate time. These are summarised as:

- that criteria is required to govern where HIA would be applied to edge or out of centre site, and this will fall within guidance separate to the Core Strategy;

- that the Council provide a more bespoke approach with regard to vacancy in local centres via the subsequent Local Plan: Site Allocations and Development Policies document, in order to proactively encourage the development of new businesses and services; and

- more information relating to improving health and wellbeing of local people, by encouraging physically active means of travel and providing access to adequate healthcare facilities, to be included within the Ensuring Choice of Travel Supplementary Planning Document.
2.4 Opportunities for physical activity

2.4.1 The following extract from the Healthy Urban Development Unit (HUDU) Checklist suggests the potential impact of planning on opportunities for physical activity.

"Health benefits

2.4.2 Reducing dependence on vehicles and providing secure, convenient and attractive open/green space can lead to more physical exercise and reduce levels of heart disease, strokes and other ill health problems that are associated with both sedentary occupations and stressful lifestyles. Further, parks and open spaces provide ‘escape facilities’ for people in urban environments and help to reduce depression. The patterns of physical activity established in childhood are perceived to be a key determinant of adult behaviour; a growing number of children miss out on regular exercise, consequently access to play areas, community or sport centres can help overcome some of the associated problems. Generally access to good quality environments for physical activity is associated with increase in the frequency of its use.

Positive effects of planning

2.4.3 Planning can create attractive, safe and convenient environments that encourage people to walk and cycle to school, their place of work or shops as well as interact and thereby improve social and mental wellbeing. Development plans can ensure adequate recreational opportunities with equality of distribution among the community and in suitably accessible locations. Green space should be protected, created and enhanced, for example by incorporating activity equipment. This requires partnership working between a variety of service providers such as healthcare, social services, education professionals, employment and environmental experts, as well as the parks and open spaces functions of the local authority. Shared knowledge and best practice examples can help inform the planning process.

Potential negative impacts of planning

2.4.4 Failing to protect local green spaces and playing fields near to communities can limit the opportunities for exercise. Isolated developments which do not facilitate wider community interaction can lead people to have sedentary lifestyles as well as contribute towards mental ill health. Location of housing and employment sites far away from sports, leisure or shopping facilities can contribute towards longer trip patterns and encourage excessive use of cars leading to unhealthy lifestyles."

(Extract ends)

Local context

2.4.5 Knowsley benefits from an extensive network of open countryside and green spaces. Many of the spaces are accessible to residents especially in urban areas,
and provide key benefits for the environment, sustainability, opportunities for formal
and informal recreation and improved health and quality of life. Some spaces
provide valuable nature conservation habitats of which some are designated as
Local Wildlife and/or Local Geological sites. The protection and/or enhancement of
this network is a key issue for local people.

2.4.6 Knowsley is also well served by indoor leisure facilities, playing pitches and other
outdoor sporting facilities. These include modern sports centres at Huyton, Kirkby
and Halewood, and facilities within the seven Centres for Learning which are
available for wider community use. The Leisure and Culture Park at Longview Drive,
Huyton also include a Youth Centre.

Local need

2.4.7 Key issues in relation to open space within Knowsley include:
• the need to recognise the value of Knowsley's Green Infrastructure network to
  the Borough and the City Region;
• the uneven distribution of open spaces and outdoor sports provision across the
  Borough, also including significant variations in quality and accessibility; and
• the need to enhance the quality of some of the Borough's open spaces and
  outdoor sports provision e.g. playing pitches and amenity areas.

2.4.8 Key opportunities include:
• Support the Council's Greenspace Strategy;
• Support the Mersey Forest Strategy; and
• Support the implementation of the Culture and Leisure Strategy.

2.4.9 In relation to the green spaces and leisure, the 2011 the Joint Strategic Needs
Assessment (JSNA) states that key needs for Knowsley include:
• Increased levels of physical activity within Knowsley residents, particularly young
  people, to improve health in general and reduce health inequalities;
• increased levels of children and young people engaged in positive activities; and
• improved quality of place to help to make Knowsley the 'Borough of Choice' and
  attract inward investment, thereby enhancing the potential for thriving
  sustainable communities.

Relevant Policies

2.4.10 Policies relating to opportunities for physical activities are located within several
different places within the Core Strategy, as follows:
• **CS2 Development Principles** (in part) covers opportunities for positive lifestyle
  choices, encouraging more sustainable modes of travel and protection and
  enhancement of environmental assets.
• **CS5 Green Belts** which covers new development in the Green Belt, proposals
  for a review of Green Belt boundaries and how to ensure a sustainable form of
  development.
- **CS7 Transport Networks** (in part) covers the location, design and management of new development to ensure sustainable travel.
- **CS8 Green Infrastructure** covers maintenance and enhancement of existing infrastructure, strategic green links, link to Liverpool City Region and the approach to green infrastructure and new development.
- **CS19 Design Quality and Accessibility in New Development** (in part) covers the prioritisation of walking and cycling.
- **CS21 Urban Greenspaces** covers greenspace protection, quantitative greenspace standards, accessible and quality greenspace and tree protection and the enhancement of natural and semi-natural greenspace.

*Identification of impacts*

2.4.11 Potential impacts in relation to each of the above policies are outlined within this section:

**CS2 Development Principles (in part)**

*Positive impacts:*
- CS2 (iii) recognises the need to promote more sustainable modes of transport including walking and cycling.

*Potential negative impacts:*
None

*Recommendations:*
- It should be recognised that walking and cycling, although beneficial to human health, is not an appropriate means of transport for everyone and this could be emphasised within the supporting text of Policy CS2.
  
  **Comment:** This was noted, however, it was felt that the third section of CS2 already reflects this.

**CS5 Green Belts**

*Positive impacts:*
- CS5 (i) states that the visual and recreational amenities of the Green Belt will be preserved which supports the HUDU evidence.
- Opening up parts of the Green Belt for new residential or employment development may have the effect of improving access to some areas of the Borough for physical activity and recreation.

*Potential negative impacts:*
- CS5(ii) indicates that a review of current Green Belt boundaries could lead to release of sites for housing development to meet future needs. Whilst this may contribute to the provision of adequate and affordable housing to meet need within the Borough, the potential impact on opportunities for physical activity and
recreation (and other issues such as biodiversity and climate change issues e.g. flooding) may be significant.

**Recommendations:**
- That the Policy be amended to highlight that a separate Health Impact Assessment could be undertaken on schemes which involve major development proposals on any ‘Reserved’ or ‘Safeguarded’ Location within the Green Belt, and that the recommendations of the HIA are incorporated within any development.

  *Comment: CS5 is not considered the appropriate place to introduce a requirement for HIAs which may also apply to larger sites within the urban area. As mentioned previously, Health Impact Assessment has been recognised within the Core Strategy as a tool to assess future development in CS2.*

**Further recommendations:** That criteria is required to govern where HIA would be applied and this will fall within guidance separate to the Core Strategy.
- That new development within any ‘Reserved’ or ‘Safeguarded’ Locations should retain or encourage access to adjacent open/rural areas (e.g. footpaths) and preserve as many natural features of the original character of the landscape as possible (e.g. tree-lines and hedgerows).

  *Comment: This has been noted. Detailed policies within the Local Plan: Site Allocations and Development Policies will identify the issues developers should consider when making a planning application. Detailed guidance is also provided in the Ensuring a Choice of Travel SPD which will ensure adequate provision is made for working and cycling.*

**Further recommendations:** Public Health to be involved in further consultation to develop Site Allocations and Development Policies.
- To recognise that the Green Belt land is sometimes not perceived as an area which can be used for physical activity/recreation and therefore there are opportunities for colleagues within planning/regeneration and public health to work together to encourage more use of these areas and open space in general within Knowsley, also accounting for environmental considerations.

  *Comment: This has been noted.*

**CS7 Transport Networks (in part)**

**Positive impacts:**
- CS7 (i) and (ii) seeks to ensure that ‘people can get to where they want to go be a choice of walking, cycling and public transport’, and promote development which is designed to prioritise walking and cycling, in line with HUDU guidance.

**Potential negative impacts:**
None

**Recommendations:**
• CS7 (ii) could possibly be re-worded to clarify that developments should incorporate accessibility by private vehicles (in addition to parking provision), but that this is not a sustainable mode of travel.

**Comment:** It is felt that this is already clear and therefore no changes made. Further detail in relation to accessibility will be given in Supplementary Planning Documents.

**CS8 Green Infrastructure**

**Positive impacts:**
- CS8 (i) recognises the opportunities which Green Infrastructure provides for sports and recreation within walking distance of housing and amenities. However, it is felt that this could go further by recognising that opportunities for physical activity are much more wide ranging, for example, through formal and informal play and as a means of accessing employment and services, etc.

**Potential negative impacts:**
None

**Recommendations:**
- That re-wording of Policy CS8 be undertaken to ensure that the full range of opportunities for physical activity within the Borough’s Green Infrastructure is recognised, for example, through play and as a means of accessing employment and services.

**Comment:** The Council agrees that reference to ‘access to employment and services’ will enhance the policy; changes have been made accordingly to Policy CS8. However it is considered that ‘play’ would fall within the wider definition of ‘recreation’ meaning a specific reference in this regard is unnecessary.
- That other important factors and functions of the Green Infrastructure are recognised within the supporting text of CS8 including allowing people to interact with the natural environment to promote mental wellbeing.

**Comment:** The Council agrees that additional clarification in this regard will enhance the policy; changes have been made to policy CS8.

**CS19 Design Quality and Accessibility in New Development (in part)**

**Positive impacts:**
- CS19 (4) encourages the development of places which aid with social interaction and opportunities for physical activity, which is strongly recommended through best practice. It also recognises the need to protect biodiversity and integrate local habitats which again is welcomed.

**Potential negative impacts:**
None
Recommendations:
None

CS21 Urban Greenspaces

Positive impacts:
- CS21 (i) aims to protect physical linkages between greenspaces which will aid opportunities for physical activity.
- Provision of open space specifically for children and young people is also recognised. This supports evidence relating to the importance in establishing physical activity patterns within children and young people.
- Provision of allotments is seen as important. Allotments often provide opportunities for physical activity for the elderly, and can also be important contributors for mental health and wellbeing, and encourage social interaction.
- CS21 (iii) recognises safety, maintenance and conservation of natural features as important factors within the use of greenspace.
- The focus on quality of greenspace over quantity is welcomed.
- Developer contributions to provision of open space is also welcomed; however, care should be taken to ensure that the space provided is of a decent size and quality. In some areas it may be more beneficial for developers to contribute to the upkeep of an established open space in the area, rather than provide several small areas which may not be well used.

Potential negative impacts:
- There are potential negative impacts associated with small unused greenspaces. Lack of proper management and maintenance of these sites may also be a problem and deter people from using them.

Recommendations:
- That linkages between Policy CS21 and the Knowsley Rights of Way programme are made, possibly within the supporting text of CS21. Comments: The Council agrees that the supporting text would benefit from reference to ‘rights of way’. Additional wording has therefore been provided accordingly.
- That CS21 be amended to note that developer contributions should be used in the most appropriate way i.e. provision of new open space or contribution to the maintenance or improvement of established green space within the area. Comments: The Council supports its approach in view of the reference to the ‘Greenspace Standards and New Development SPD’ which provides detailed criteria in terms of developer contributions.

Additional comments

Positive impacts:
None

**Potential negative impacts:**
None

**Recommendations:**
- That reference is made within the Core Strategy to the Borough’s Leisure and Culture Strategy.
  
  **Comment:** This is already mentioned within the IDP.

**Conclusions**

2.4.12 As part of the Interim HIA the workshop group in general felt that the Core Strategy Preferred Options report generally encouraged opportunities for physical activity within the Borough. Some minor recommendations were made around re-wording certain areas to ensure, for example, that both recreational (sports and leisure) and functional (play and accessing work or services) opportunities for physical activity are recognised. These have largely been implemented within the proposed Submission Document, and where this has not been the case adequate explanation has been given for this.

2.4.13 The main potential negative impact of the Core Strategy on opportunities for physical activity would be the release of land within the Green Belt for development. The Interim HIA therefore recommended that significant sites released for major redevelopment be subject to a separate Health Impact Assessment process and also, that steps be taken to ensure that any development retains or improves access to surrounding rural areas, as appropriate.

2.4.14 In response to these recommendations, the Council’s Policy, Impact and Intelligence Division feel that the Core Strategy is not the appropriate document with which to address these issues. Health Impact Assessment has already been recognised within the Core Strategy as a tool to assess future development in CS2, however further criteria in this respect are needed. Therefore some additional recommendations arising from this final HIA are as follows:

- That criteria be developed to govern where HIA would be applied to schemes which involve major development proposals on any ‘Reserved’ or ‘Safeguarded’ Location within the Green Belt, while recognising that this will fall within guidance separate to the Core Strategy.

- Public Health to be involved in further consultation to develop Site Allocations and Development Policies, which will identify the issues developers should consider when making a planning application. This document should seek to retain or encourage access to adjacent open/rural areas (e.g. footpaths) and
preserve as many natural features of the original character of the landscape as possible (e.g. tree-lines and hedgerows).
2.5 **Air, Noise and Neighbourhood Amenity**

2.5.1 The following extract from the Healthy Urban Development Unit (HUDU) Checklist suggests the potential impact of planning on air, noise and neighbourhood amenity

"**Health benefits**

2.5.2 The health benefits of improved air quality include a reduced incidence of chronic lung disease (chronic bronchitis or emphysema) and heart conditions and, probably, reduced levels of asthma among children. Noise pollution can have detrimental impact on health via hearing impairment, sleep disturbance, cardiovascular and psycho-physiological effects. Appropriate insulation can contribute towards lessening of the impact of noise. The availability of amenity space can facilitate physical activity by encourage people to go outside and walk thereby increasing people’s physical activity rate and sense of general wellbeing.

**Positive effects of planning**

2.5.3 Planning can significantly influence land use by ensuring detailed assessment of air pollution and noise, as well as help to segregate polluting and noisy uses from residential areas. It can safeguard or enhance green space to act as ‘green lungs’ for the community as well as implement tree planting in context of developments to buffer areas from noise. It can ensure good quality amenity space is incorporated into developments, deter car use and restrict lorries to specific routes to avoid contributing towards air pollution for example near schools or town centres.

**Potential negative impacts of planning**

2.5.4 Poor air quality results in part from ineffective land use and transport strategies, this can lead to high levels of road traffic and factories for instance polluting residential areas. Extensive research demonstrates that living in proximity to busy roads is linked to negative health outcomes resulting from vehicle emissions. The absence of good-neighbour policy can mean that residents and workers are subject to excessive noise and unpleasant fumes. Further visually arid environments with regards to amenity space can undermine wellbeing by not being welcoming or pleasant causing people to stay at home and not go out and be physically active thereby contributing towards illness in the long run."

(Extract ends)

**Local context**

2.5.5 Air quality is generally good and there are no Air Quality Management Areas within Knowsley.

2.5.6 In terms of neighbourhood amenity, Knowsley benefits from an extensive network of open countryside and green spaces. Many of the spaces are accessible to residents especially in urban areas, and provide key benefits for the environment,
sustainability, opportunities for formal and informal recreation and improved health and quality of life.

2.5.7 Some spaces provide valuable nature conservation habitats some of which are designated as Local Wildlife and/or Local Geological Sites. The protection and/or enhancement of this network is a key issue for local people.

2.5.8 Knowsley’s built environment contains a variety of 20th century and older development. The newer parts of these towns are characterised by their suburban character typical of urban development from the 1920s and 1930s as well as more recent municipal and private sector estates. Whilst this contributes to a significant local sense of place and community in parts of the Borough, there is a relatively uniform and/or indistinct built environment in some of the 20th century housing and industrial areas. There is however a strong local sense of place evident in some of the older parts of the Borough based for example on the use of local red sandstone, Welsh slate and red brick in the buildings.

2.5.9 Knowsley contains 121 individual listed structures, of which one is Grade I, four are Grade II*, and 116 are Grade II. The listed buildings range from large buildings of grandeur, such as Knowsley Hall, to structures like railway bridges. There are no listed buildings in Knowsley on the national buildings at risk register.

2.5.10 Knowsley has fifteen Conservation Areas, two of which are considered by English Heritage to be at risk. South Park Road in Kirkby is described as “deteriorating” while Prescot Town Centre is described as “Improving”. In addition, three of the Conservation Areas are designated as “Article 4" areas where the planning controls over even minor developments are tighter than elsewhere. The Council has published Conservation Area Appraisals which identify the key characteristics of each area and any changes (e.g. to key buildings or the streetscape) which have occurred since their designation.

Local need

2.5.11 Key issues in relation to neighbourhood amenity within Knowsley include:

- The need to recognise the value of Knowsley’s Green Infrastructure network to the Borough and the City Region;
- the uneven distribution of open spaces and outdoor sports provision across the Borough, also including significant variations in quality and accessibility; and
- the need to enhance the quality of some of the Borough’s open spaces and outdoor sports provision e.g. playing pitches and amenity areas;
- the need to maintain and enhance current historic environment assets;
- that two of the Borough’s Conservation Areas are considered to be at risk; and
- the relatively uniform character of the built environment in some parts of the Borough.

2.5.12 Key opportunities include:
Support the Council's Greenspace Strategy;
Support the Mersey Forest Strategy;
Support the implementation of the Leisure and Culture Strategy; and
Support actions to strengthen local sense of place, variety, wellbeing and distinctiveness through a stronger approach to design of new development.

2.5.13 In relation to amenity space, the 2011 JSNA states that key needs for Knowsley include:
- increased levels of physical activity within Knowsley residents, particularly young people, to improve health in general and reduce health inequalities;
- increased opportunities that bring people together and help people to support themselves and develop stronger citizenship; creating safer more cohesive communities and preventing poor health and wellbeing;
- increased levels of children and young people engaged in physical activities; and
- improved quality of place to help to make Knowsley the ‘Borough of Choice’ and attract inward investment, thereby enhancing the potential for thriving sustainable communities.

Relevant policies

2.5.14 Policies relating to air quality, noise and neighbourhood amenity are located within several different places within the Core Strategy, as follows:
- **CS2 Development Principles** (in part) covers the recognition of environmental limits, protection and enhancement of environmental assets, local character and quality of place.
- **CS8 Green Infrastructure** which covers maintenance and enhancement of existing infrastructure, strategic green links, link to Liverpool City Region and the approach to Green Infrastructure and new development.
- **CS19 Design Quality and Accessibility in New Development** (in part) covers the opportunities to enhance local distinctiveness and identity of places.
- **CS20 Managing Heritage** covers preservation and enhancement of historical and architectural assets.
- **CS21 Urban Greenspaces** covers greenspace protection, quantitative greenspace standards, accessible and quality greenspace and tree protection and the enhancement of natural and semi-natural greenspace.

Identification of impacts:

2.5.15 Potential impacts in relation to each of the above policies are outlined within this section:

**CS2 Development Principles (in part)**

*Positive impacts:*
• CS2 (iv) encourages new development which protects and enhances environmental assets and enhances local character and quality of place. This is clearly in line with the overall guidance from HUDU.

Potential negative impacts:
• There is a lack of specific guidance in relation to noise pollution, which given the Borough has two motorways running through it, should not be overlooked. Evidence suggests that noise can have a significant detrimental impact on human health.

Recommendations:
• Whilst the principle that new development will have ‘no negative impact upon flood risk, air quality, etc’ is commendable, and a positive in terms of human health, however, it is questionable how realistic this is and how it would be measured and implemented. It is therefore recommended that this be reworded to take account of these issues.
  Comment: Policy CS2 has been amended to reflect this.
• More specific guidance on noise levels should be included where appropriate (i.e. within the Core Strategy or Supplementary Planning Documents). Work to be undertaken with the Scientific Officer to make links to the Merseyside Noise Policy.
  Comment: This is noted although it is considered that specific references to noise policy are generally outside of the scope of the Core Strategy, although could be suitable for incorporation in a future part of the Local Plan.
Further recommendations: Noise issues to be considered as part of future Local Plan documents where appropriate.

CS8 Green Infrastructure

Positive impacts:
• CS8 (i) aims to maintain and enhance existing Green Infrastructure to ensure more attractive and cleaner residential neighbourhoods, promote biodiversity and preserve the character of historic environments. This is clearly in line with relevant evidence within the HUDU and is therefore a positive.
• The need to increase community access to greenspace is also recognised within CS8, which is a positive. However, it is felt that more could be made of opportunities for the community to become more involved in the use and management of greenspaces, for example, through joining/forming ‘Friends of’ groups, undertaking maintenance and community growing projects etc. This will allow communities to take more ownership of open spaces, and provide opportunities for increasing skill-levels and mental wellbeing.

Potential negative impacts:
• CS8 does not currently actively promote open space for local food production. Although it is recognised that this is not a high priority for the Borough at the
moment, in 2028 demand may be significantly higher, and the policy should allow for this.

Recommendations:
• That other important factors and functions of Green Infrastructure are recognised within Policy CS8 including its function as a buffer zone to reduce the impact of air and/or noise pollution.
  Comment: The Council agrees that additional clarification in this regard will enhance the policy; changes have been made to policy CS8.
• That opportunities for increased community involvement are explored, although this could be considered as part of the overarching policies of CS1 or CS2.
  Comment: The Council agrees that additional clarification in this regard, however the inclusion of such a requirement is better located within an overarching policy or the design policy CS19.
• That reference to areas for local food production is made either within the policy itself or within the supporting text.
  Comment: The Council agrees that additional clarification in this regard will enhance the policy; changes have therefore been made to policy CS8 to better align the policy with CS21.

CS 19 Design Quality and Accessibility in New Development (in part)

Positive impacts:
• Reference to new development which integrates the positive characteristics of surrounding areas and the recognition that well designed places have an impact on social integration is welcomed and in line with HUDU evidence.

Potential negative impacts:
None

Recommendations:
• That reference is made within CS19 (1) to the importance of responding to, complementing and integrating views and scenery, particularly of natural landscapes, possibly within the supporting text.
  Comment: The Council agrees and additional wording has been provided accordingly.
• That reference to ‘unacceptable impacts’ as stated in CS19 (7) is further explained within the Policy itself or the supporting text.
  Comment: The Council considers that appropriate clarity has already been provided within the supporting text and a strategic link to other saved policies is also given for additional context.
• That potential conflicts between aesthetic design quality and environmentally friendly design are explored and tackled, potentially within the Design Quality in New Development Supplementary Planning Document.
Comment: The Council agrees but feels that this level of detail is more appropriate within the Design Quality in New Development Supplementary Planning Document.

Further recommendations: Ensure that the future versions of the Design Quality in New Development Supplementary Planning Document incorporate consideration of potential conflicts between aesthetic design quality and environmentally friendly design.

CS20 Managing Heritage

Positive impacts:
- CS20 is well received and seen as a positive for the health of the Borough, particularly in encouraging the re-use of vacant historic assets and introduction of public access.

Potential negative impacts:
None

Recommendations:
- There is potential conflict between improving the energy efficiency of a historic building, whilst also preserving its character. However, often older buildings can be colder with higher levels of damp and draughts than modern housing. This can be detrimental to human health, particularly, the elderly and vulnerable. It is felt that CS20 should state the need to improve the energy efficiency of historic buildings where this is appropriate, whilst accounting for conservation requirements. Further guidance about this could be given within the Design Quality in New Development Supplementary Planning Document. Comment: The Council agrees that the policy is enhanced through reference of energy efficiency and additional wording in this regard has been provided.

CS21 Urban Greenspaces

Positive impacts:
- CS21 is seen as having an overall positive impact on health by encouraging greenspace protection and recognising the need for all members of the community to access it. Maintenance and conservation of natural features are also seen as positives.

Potential negative impacts:
None

Recommendations:
None
Conclusions

2.5.16 The Interim HIA found that in general the Core Strategy reflects the HUDU evidence which indicates the importance of preserving neighbourhood amenity, particularly through the protection and provision of greenspace and retaining the character of the local environment, particularly the historic environment. Some minor changes were recommended to reflect opportunities for community involvement within green spaces and the importance of tackling energy efficiency within historic buildings. These have largely been taken into account within the proposed Submission Document.

2.5.17 The Interim HIA also found that the Core Strategy could be stronger in relation to noise pollution, for example, by referencing the Merseyside Noise Policy where appropriate, possibly in the supporting text of the document. It recommended that work with the Scientific Officer should be undertaken to facilitate this. Whilst this was noted, it is considered that specific references to noise policy are generally outside of the scope of the Core Strategy, although could be suitable for incorporation in future Local Plan documents. A further recommendation therefore suggests that noise issues to be considered as part of future Local Plan documents where appropriate.

2.5.18 In addition it is recommended that future versions of the Design Quality in New Development Supplementary Planning Document incorporate consideration of potential conflicts between aesthetic design quality and environmentally friendly design.
2.6 Accessibility and transport

2.6.1 The following extract from the Healthy Urban Development Unit (HUDU) Checklist suggests the potential impact of planning on accessibility and transport and health.

“Health benefits

2.6.2 Easy, well orientated and walk-able access to a range of services and facilities minimises the need to travel and provides greater opportunities for social interaction. Buildings and spaces that are easily accessible and safe also encourage all groups to use them including the elderly and people with disability. This helps with general and mental wellbeing. Reducing dependence on cars and motorised forms of travel can lead to more physical exercise and reduce levels of heart disease and other chronic illnesses.

Positive effects of planning

2.6.3 Planning can improve places with regard to inclusive design, access, orientation and streetscape. Manual for Streets provides useful guidance for those involved in planning and design. Planning can improve the choice of different transport modes available, in particular by making local facilities more accessible to people walking, cycling and using public transport. Cycling and walking networks can be promoted and traffic calmed to help reduce vehicle speeds in residential as well as town centre areas and lessen rates of severe accidents. Additionally, establishment of Home Zones and community involvement in the creation of the built environment can create a sense of ownership and community empowerment which helps to enhance community safety.

Potential negative impacts of planning

2.6.4 Poor planning can restrict or hinder access in terms of orientation and layout of places and buildings, further it can restrict access to a range of services and facilities leading to disadvantage for certain groups in the community, such as the elderly, women, children and people with impairments. Additionally shopping facilities located outside of walk-able town centre areas not only increase car dependency but can also reduce retail options and economic vitality of town centres.”

(Extract ends)

Local context

2.6.5 Knowsley has good transport links which facilitate movement of people and goods to and from the Liverpool Ports, Liverpool John Lennon Airport, Liverpool City Centre, Manchester and the rest of the country.

2.6.6 The road network includes the M62, A580 (East Lancashire Road), and A562, which provide strategic east-west routes linking Liverpool with locations to the east including Manchester, Warrington and the national motorway network. The
M57/A5300 provides a major north to south road route through the centre of the Borough.

2.6.7 Links by public transport to Liverpool are generally good by both train and bus while those in the north to south direction through Knowsley are weaker.

2.6.8 Plans for transport improvements (both short and long term) are set out in the Third Local Transport Plan, which covers the period from 2011 until 2024.

Local need

2.6.9 Key issues in relation to transport and connectivity within Knowsley include:
- the need to enhance public transport links between Knowsley’s townships and key employment areas, Whiston Hospital, and in a North-South direction through the Borough; and
- the need to ensure transport infrastructure requirements associated with future development needs and resulting from key city region projects e.g. Liverpool Super Port, Mersey Gateway Bridge and proposed expansion of Liverpool John Lennon Airport are met.

2.6.10 Key opportunities include:
- capitalisation on the strengths of existing transport networks, including east to west connections to Liverpool and Manchester;
- support for proposals to strengthen the transport network in Knowsley; and
- capitalisation on the strengths afforded by working with neighbouring authorities on a joint Local Transport Plan.

2.6.11 In relation to transport, the current JSNA states that key issues for Knowsley include:
- low car ownership could indicate an increased reliance on other transport modes such as public transport, walking and cycling to access jobs and services;
- affordability of public transport may be an issue for some residents;
- availability of public transport services which run north / south within the Borough, although they are regular (as per the timetable) they are infrequent (e.g. half hourly services after peak hours or stop completely in the evening)
- the need to contribute to carbon reduction by providing access to sustainable modes of transport.

Relevant Policies

2.6.12 Policies relating to accessibility and transport are located within several different places within the Core Strategy, as follows:
- CS2 Development Principles (in part) covers the need to reduce travel and increase accessibility.
• **CS7 Transport Networks** covers transport and connectivity issues, in particular, the overall Transport Strategy, location, design and management of new development and strategic transport schemes and programmes.

• **CS19 Design Quality and Accessibility in New Development (in part)** covers provision of safe, secure and convenient routes for movement and integration and connectivity of new development.

**Identification of impacts**

2.6.13 Potential impacts in relation to each of the above policies are:

**CS2 Development Principles (in part)**

*Positive impacts:*
- CS2 (iii) recognises the need to locate development so as to reduce the need to travel and promote safe and sustainable access for all, particularly by promoting the use of public transport, walking and cycling. This is strongly in line with HUDU evidence and therefore will have a positive impact on human health, if implemented as stated.

*Potential negative impacts:*
None

*Recommendations:*
None

**CS7 Transport Networks**

*Positive impacts:*
- Recognition of the need to enhance road safety is a positive impact and is welcomed, as is the continued focus on public transport, walking and cycling.
- The reference within CS7(ii) to new and emerging technologies to minimise carbon emissions is positive, however, it is felt that this could be strengthened through an additional reference to improving air quality.

*Potential negative impacts:*
- Potential schemes supported within CS7 such as the further development of Liverpool John Lennon Airport and Knowsley Rail Freight Terminal have the potential to impact negatively upon residents within Knowsley, for example, through increased noise and air pollution.

*Recommendations:*
- Although it is recognised that CS7 supports the implementation of the major projects within the Merseyside Local Transport Plan 3, reference to this document would strengthen these links and help to ensure that all elements of the LTP3 are implemented across Knowsley.
Comment: Text has been amended accordingly.

- Clarity could be provided in relation to the definition of ‘smaller scale proposals’ where Transport Assessments and/or Travel Plans will not be required.  
  Comment: Further appropriate text has been added.

- CS7 (ii) could be strengthened by:
  - Re-wording to emphasise that it should be the developer’s responsibility to ensure that their site is accessible by public transport, walking and cycling and to make the necessary improvements to local infrastructure to support this. (Links with the Infrastructure Delivery Plan to be made here).
  - Re-wording to ensure clarity over priority for sustainable modes of travel over the need of private vehicles.
  - Adding a reference to the Ensuring Choice of Travel Supplementary Planning Document.
  - Making reference to air quality within (4).  
  Comment: Further appropriate text has been added as follows ‘Further guidance on these issues will be provided in a revised Ensuring Choice of Travel SPD’

- That consideration be given to the use of/or explanation of the term ‘Active Travel’ within the policy or supporting text, to align with terminology within the LTP3. However, the difficulty of using language which is not an adopted planning terms is recognised.  
  Comment: If is felt that people will understand ‘walking’ and ‘cycling’ better and that active travel may cause confusion.

- In order to mitigate against any negative impacts of the proposed schemes within CS7 (iii), it is proposed that Knowsley Council ensure (through requiring developers of schemes within Knowsley or lobbying those leading on the development of schemes outside the Borough) that separate Health Impact Assessments are carried out on major proposals at an appropriate time.  
  Comment: Health Impact Assessment has already been recognised within the Core Strategy as a tool to assessment future development.

Further recommendations: That criteria is required to govern where HIA would be applied and this will fall within guidance separate to the Core Strategy.

- CS7 (iii) could also be strengthened by the addition of an extra bullet point which encourages development of multi-modal transport sites.  
  Comment: CS7 (iii) already contains priority to schemes which would provide for provision of Park and Ride facilities; and expansion and/or improvement of the Knowsley Rail Freight Terminal, and this is considered sufficient.

- Opportunities to promote community transport through CS7 should be explored, or at least, future expansion of community transport projects should not be inhibited by the proposed Policy.  
  Comment: The Council’s desire to work with the community transport sector has been added to supporting text.

- CS7 could also include reference to the importance of maintenance of transport hubs in encouraging safety and use by all sectors of the community.  
  Comment: This is not considered to be a strategic issue.
CS19 Design Quality and Accessibility in New Development (in part)

Positive impacts:
- Reference to provision of safe, secure and convenient routes for movement, and integration and connectivity of new development is welcomed and in line with best practice.

Potential negative impacts:
None

Recommendations:
- The importance of creating legible environments where people can orientate themselves easily both within development sites and internally within buildings could be mentioned, either within CS19 or in the Design Quality in New Development Supplementary Planning Document.
  Comment: The Council agrees that there is a need to provide detailed guidance on issues such as legibility as a component of design quality. However the level of specific detail required in this context is not of a strategic nature that can be included within a Core Strategy.
  Further Recommendations: Ensure that additional and more detailed guidance on this issue is provided with the emerging Design Quality in New Development SPD.
- In addition, internal building design should reflect health objectives, for example, by placing stairs in a more prominent position than the lifts, making optimum use of views and natural light.
  Comment: The Council agrees that there is a need to provide detailed guidance on issues such as legibility as a component of design quality. However the level of specific detail required in this context is not of a strategic nature that can be included within a Core Strategy.
  Further Recommendations: Ensure that additional and more detailed guidance on this issue is provided with the emerging Design Quality in New Development SPD.
- Appropriate signage could also be mentioned as a means of helping people orientate themselves more easily.
  Comment: The Council agrees that the policy is enhanced through reference to ‘appropriate signage’ and additional wording in this regard has been provided accordingly.

Additional comments
None
Conclusions

2.6.14 The Interim HIA recognised that both the PCT and Council were working towards making services within the area more accessible, for example, by use of Centres for Learning for leisure classes and multi-functional buildings such as the Halewood Centre. However, there are still problems with accessibility to some areas and facilities within the Borough.

2.6.15 The Core Strategy Preferred Options Report generally promoted recognised best practice by encouraging increased accessibility for public transport, walking and cycling. Relatively minor word changes were suggested to ensure integration with the Local Transport Plan 3 and other relevant documentation, and to reflect health objectives. These have largely been taken into account within the Proposed Submission Document of the Core Strategy.

2.6.16 The Interim HIA raised some concern surrounds the impact of large transport infrastructure proposals in and around the Borough and the affect that they will have on the health of residents. It was therefore recommended that separate Health Impact Assessments be undertaken on these major projects at an appropriate juncture to establish potential mitigation measures against any negative impacts. Similar to other issues where HIA was raised, the Council's Policy, Impact and Intelligence Division felt that there were more appropriate documents where this requirement should sit. A further recommendation is therefore that:

- That criteria be developed to govern where HIA would be applied to major proposals but that this fall within guidance separate to the Core Strategy

2.6.17 It is further recommended that more detailed design guidance is included within the emerging Design Quality in New Development SPD, on the following issues:

- the importance of creating legible environments where people can orientate themselves easily both within development sites and internally within buildings; and
- Internal building design should reflect health objectives, for example, by placing stairs in a more prominent position than the lifts, making optimum use of views and natural light.
2.7 Crime Reduction and Community Safety

2.7.1 The following extract from the Healthy Urban Development Unit (HUDU) Checklist suggests the potential impact of planning on crime reduction and community safety.

"Health benefits

2.7.2 Crime reduction can be enhanced by thoughtful planning and urban design, while mental wellbeing of residents can be enhanced by helping to reduce the psychological ‘fear of crime’. In relation to community safety aspects such as road traffic accidents for example could be addressed by traffic calming measures in particular for vulnerable groups including the young, elderly and disabled who are at particular risk.

Positive effects of planning

2.7.3 The detailed design and layout of residential and commercial areas can ensure natural surveillance over public space that can reduce both the fear of and the actual incidence of crime. This can be assisted by creating places where people mix, enabling possibilities for community interaction and avoiding social exclusion. Further, via active use of streets, public spaces and utilisation of effective lighting there is likely to be decreased opportunities for anti-social behaviour or criminal activity. The design process can be assisted by proposals going through the Secure by Design process, a police initiative focusing on crime prevention measures in the design of developments.

Potential negative impacts of planning

2.7.4 Crime can include damage to property as well as violence, injury and other offences against the person, indirect long-term influences can include the psychological and physical consequences of injury, victimisation and isolation because of fear. Urban planning can do much to worsen or alienate the problem of safety on the streets via poor design, unfriendly environments or non-consideration of community safety. Where the local pedestrian environment is intimidating and inconvenient, people use cars, and social interaction is reduced and potential for crime enhanced."

(Extract ends)

Local context

2.7.5 The current Joint Strategic Needs Assessment (JSNA) suggests that recorded crimes within Knowsley has significantly reduced, although perception of crime has not fallen at the same rate and therefore remains a major issue.

2.7.6 Despite this, some areas of the Borough continue to experience high levels of crime and anti-social behaviour. These are generally the more deprived areas including north Huyton and Kirkby. Despite reductions in crime, North Huyton still account for
around 25% of all crime and Police recorded anti-social behaviour incidents in the Borough.

2.7.7 The Knowsley Place Survey 2008 found that anti-social behaviour was perceived to be a bigger problem in Knowsley than in the North West and England overall. However, the proportion of Knowsley residents who believe that the local council and police deal with and understand local concerns about anti-social behaviour is higher than the North West and England average.

2.7.8 Nearly one third of residents perceive drunk or rowdy behaviour as a problem in Knowsley. This figure is higher than the England average but less than across the North West. Nearly half of Knowsley residents perceive drug use or drug dealing as a problem. This is much higher than across the North West and England where only 35% and 31% of people respectively see these issues as a problem.

Local need

2.7.9 In relation to crime and community safety the emerging JSNA states that key needs for Knowsley include:
- dealing with perceptions of crime and disorder in Knowsley;
- dealing with the distribution of crime and disorder in Knowsley;
- tackling particular types of crime such as offences and repeat victimisation;
- tackling anti-social behaviour;
- dealing with the impact of substance misuse; and
- the impact of health if ‘you’ are an offender.

Relevant Policies

2.7.10 Policies relating to crime and community safety are located within several different places within the Core Strategy, as follows:
- **CS2 Development Principles** (in part) covers the need for safe access for all and highway safety.
- **CS7 Transport Networks** (in part) covers road safety.
- **CS19 Design Quality and Accessibility in New Development** (in part) covers the need to create safe, secure and convenient routes for movement and minimise crime, fear of crime and anti-social behaviour.
- **CS21 Urban Greenspaces** (in part) covers safety of open space.

Identification of impacts:

2.7.11 Potential impacts in relation to each of the above policies are:

**CS2 Development Principles (in part)**

*Positive impacts:*
• CS2 (iii) makes reference to the need for safe and sustainable access for all and also refers to the need for improved road safety. This is in line with the HUDU best practice.

Potential negative impacts:
None

Recommendations:
None

CS7 Transport Networks (in part)

Positive impacts:
• CS7 (i) recognises the need to enhance road safety and improve the health and wellbeing of local people, again this is in line with the HUDU document.

Potential negative impacts:
None

Recommendations:
None

CS19 Design Quality and Accessibility in New Development (in part)

Positive impacts:
• CS19 (4) recognises the need to create places which encourage social interaction, and create natural surveillance of areas, reducing crime and fear of crime.
• CS19 (5) talks about the creation of safe and secure routes for movement and, within Point 8, reducing crime, fear of crime and anti-social behaviour. This is strongly worded and is welcomed.
• CS19 (9) refers to the need for long-term management and maintenance plans to be in place. This is again important in creating areas which are well-kept and used, therefore increasing community safety.

Potential negative impacts:
None

Recommendations:
• That CS19 (8) is strengthened through reference to the principles of Secure By Design, the recognised standard for improving community safety through design. A reference to the need to create natural surveillance here or in (4) would also be welcomed.

Comment: The Council agrees that the policy is enhanced through reference to ‘natural surveillance’ and additional wording in this regard has been provided accordingly. However it is considered that the approach of referencing the
Reference to the need for landscaping which is appropriate for the area and given long term consideration would also reinforce the community safety priority. **Comment:** The Council agrees that clarification of the expectation that associated landscaping is delivered will enhance the policy approach. Additional wording has been provided accordingly.

- Specific reference could be made to the importance of highway design in creating streets which encourage social interaction and play e.g. Home zones and/or the Manual for Streets (or this may be more appropriate within CS19 or within a relevant Supplementary Planning Document).  
  **Comment:** The Council agrees that there is a need to provide detailed guidance on issues such. However the level of specific detail required in this context is not of a strategic nature and cannot therefore be included within a Core Strategy. **Further Recommendations:** Ensure that additional and more detailed guidance on highway design and encouraging social interaction is provided within the emerging Design Quality in New Development SPD.

CS21 Urban Greenspaces (in part)

*Positive impacts:*
- Reference to safe and secure locations and maintenance of facilities within CS21 (iii) is in line with HUDU evidence.

*Potential negative impacts:*
None

*Recommendations:*
- That CS19 (8) is strengthened through reference to the principles of Secure By Design, the recognised standard for improving community safety through design, or via reference within the supporting text to CS19.  
  **Comment:** The Council considers that the approach of referencing the principles of Secured by Design within the supporting text of CS19 rather than within a policy is appropriate given the need for flexibility to adapt to future initiatives that may emerge during the plan period. Changes to CS19 have been made accordingly.

- Further links could be made with the Greenspace Strategy and the need to increase community safety within open spaces within the Borough.  
  **Comment:** The Council supports its approach of making specific reference to Knowsley’s Green Space Strategy within CS8, with reference to the linkage within the supporting text of this policy. Furthermore the issue of community safety is already addressed within the policy as part of accessibility and also remains part of quality.
Additional comments

Positive impacts:
- The Private Finance Initiative to improve street lighting levels within the Borough is seen as a positive in terms of health. The Core Strategy, or subsequent part of the Local Plan, could be strengthened by encouraging the incorporation of sensitive lighting within the design of new development including housing, business and transport hubs, to reduce opportunities for crime.

Potential negative impacts:
None

Recommendations:
- That the Core Strategy or a subsequent Local Plan document include measures to encourage the incorporation of sensitive lighting within the design of new development including housing, business and transport hubs, to reduce opportunities for crime and fear of crime. It is recognised that this may be most appropriate within a relevant Supplementary Planning Document. **Comment:** The Council considers that appropriate clarity with regard to 'unacceptable impacts' has already been provided in this regard within the supporting text, and provides a strategic link to more specific detail within a saved policy in the UDP: ENV3 (until subsequently superseded by the Local Plan: Site Allocations and Development Policies document).

- That community involvement in the design of new facilities and community ownership/maintenance of open spaces and other areas be encouraged to help increase community safety, for example, through ‘Friends of’ groups. **Comment:** The Council agrees that clarification of the expectation of community engagement in the design process will enhance the policy approach. Additional wording has been provided accordingly.

Conclusions

2.7.12 Although crime levels have reduced in recent years within Knowsley, it is recognised that the physical environment within some areas can continue to encourage or facilitate crime, for example, through Radburn housing layouts in some of the Borough’s residential areas.

2.7.13 The Interim HIA largely felt that the Core Strategy Preferred Options Report reflected the best practice information from HUDU in relation to Crime and Community Safety. References to safe and secure access for all, the creation of places for social interaction and the importance of maintenance are all welcomed. It was recommended that some of the policies could be strengthened in this area by reference to recognised standards and concepts such as Secure By Design, Home zones and the Manual for Streets, and this has been taken on board within the proposed Submission Document.
A further recommendation arising from the Final HIA is that more detailed design guidance is included within the emerging Design Quality in New Development SPD, on the following issue:

- The importance of highway design in creating streets which encourage social interaction and play e.g. Home zones and/or the Manual for Streets
2.8 Access to healthy food

2.8.1 The following extract from the Healthy Urban Development Unit (HUDU) Checklist suggests the potential impact of planning on access to healthy food.

“Health benefits

2.8.2 Social gradients in the quality of diet and sources of nutrients contribute to inequality in health through the excessive consumption of for example salt, oil, energy-dense fat and sugar. Dietary goals to prevent chronic disease consistently emphasise the need to eat more fresh fruit and vegetables. People on low incomes, including young families, elderly and unemployed people, are the least able to eat well. Access to healthy and nutritious food can improve general health. Further small scale neighbourhood schemes which facilitate production of local foods can promote mental health by increasing levels of physical activity, reducing social isolation and improving self-esteem and confidence.

Positive effects of planning

2.8.3 By ensuring that food access and location options are considered in the planning process, including the facilitation of social enterprise, poor health conditions (including obesity and malnutrition) can be lessened by residents being able to buy food that is nutritional and affordable. Planning can assist by preserving and protecting areas for small-scale community projects, opportunities for local food production, diversity of shopping facilities in local centres, and help to alleviate individual reliance on large supermarkets, which may not be local to all residents. Retention of local allotment gardens, small holdings and development of farmers markets can also provide a convenient venue for the distribution of local and/or affordable produce.

Potential negative impacts of planning

2.8.4 Planning can struggle to deal with issues in relation to food especially in terms of affordability and accessibility, due to a lack of central government planning policy in this area. The centralisation of shopping facilities and growth of large supermarkets can reduce the variety of foods available locally and disadvantage those on limited income to afford a healthy diet, and hence this can exacerbate social inequity. Redevelopment of local allotment gardens or agricultural land can also lessen the potential availability of locally produced foods for residents."

(Extract ends)

Local context

2.8.5 The Joint Strategic Needs assessment (JSNA) notes that adult obesity prevalence in Knowsley is lower than both North West and National figures (respectively at 24.5% and 23.5%) and is predicted to be at 23.4% in 2010. However combined overweight and obesity rates for adults are suspected to be around 60% prevalence in the adult population of Knowsley. Childhood obesity in Knowsley continues to be a priority
area for Knowsley. Rates of Reception year children are around 13%, but by Year 6 increases to 23%.

Local need

2.8.6 The JSNA recognises that there is a continued need to prevent the onset of childhood obesity through the promotion of healthy lifestyle services and interventions. It is also recognised that in poor areas of Knowsley, access to healthy food can be a problem and cooking skills and facilities may be limited. This can make it harder to eat well, particularly on a low budget.

2.8.7 With regard to spatial planning and access to healthy food, the Core Strategy through the supporting text to policy CS6 Town Centres and Retail Strategy makes reference to the absence of a major foodstore in Kirkby Town Centre, Halewood district centre and Stockbridge Village district centre, which are areas generally suffering from significant levels of deprivation.

2.8.8 It is also recognised that there is a proliferation of takeaway food outlets within some areas of the Borough, for example, Kirkby, Huyton and Prescot Town Centres. According to research recently undertaken by Knowsley Council and PCT, these outlets generally serve large portions of food which includes high salt levels, saturated fats and sugar in some cases. Other authorities are considering measures to control the increase in takeaway food outlets through the use of supplementary planning guidance, licensing restrictions and other disincentives, although these approaches are at a relatively early stage within their development.

Relevant Policies

2.8.9 Policies relating to access to healthy food are located within several different places within the Core Strategy, as follows:

- **CS6 Town Centres and Retail Strategy** (in part) covers New Convenience Goods Shopping.
- **CS8: Green Infrastructure** (in part) covers functions of greenspace.
- **CS21: Urban Greenspaces** (in part) make reference to allotments.

Identification of impacts

2.8.10 Potential impacts in relation to each of the above policies are outlined within this section:

CS6 Town Centres and Retail Strategy

*Positive impacts:*

- **CS6 (iii)** recognises need for new convenience retail floorspace within Kirkby town centre, Halewood and Stockbridge Village, which are some of the most deprived areas within the Borough.
**Potential negative impacts:**
None

**Recommendations:**
- That opportunities are explored to encourage the establishment of new local businesses and particularly social enterprise which encourage the provision of food within areas where access to fresh food and diet are particularly poor. However, it is recognised that this may only really be achievable where the Council owns the business premises and that this may be outside the remit of the planning process.

**Comment:** The Council does consider that this is outside the scope of the Core Strategy.

**Further recommendation:** To consider opportunities for the Council to encourage the provision of food within areas where access to fresh food and diet are particularly poor, for example, through Asset Management.

- That the supporting text to CS6 references the need for provision of a suitable retail environment for affordable, fresh produce, particularly in some of the more deprived areas of the Borough.

**Comment:** The Council considers that the level of detail required in this regard is not suitable to be provided in a document such as the Core Strategy, which has a strategic focus. It is therefore the Council’s intention to consider a more bespoke approach with regard to the suitability and function of different retail uses via the subsequent Local Plan: Site Allocations and Development Policies document.

**Further recommendation:** That the future Local Plan: Site Allocations and Development Policies document refers to the need to consider a more bespoke approach with regard to the suitability and function of different retail uses including provision of a suitable retail environment for affordable, fresh produce, particularly in some of the more deprived areas of the Borough.

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**Policy CS8 Green Infrastructure (in part)**

**Positive impacts:**
None

**Potential negative impacts:**
None

**Recommendations:**
- That reference to local food production (e.g. farms, small holdings and allotments) is added within CS8 (i) as appropriate. This will increase recognition of these issues and will also provide increased protection for allotment sites within CS21 (which refers to the protection of Green Infrastructure functions listed in CS8).
Comment: The Council agrees that some additional clarification in this regard will enhance the policy; changes have been made to policy CS8 to refer to allotments and better align the policy CS21.

Policy CS21 Urban Greenspaces (in part)

Positive impacts:
- That a quantitative standard is set for the provision of allotments within the Borough (0.05 hectares per 1000 population, within 1.6km/20minutes walk).

Potential negative impacts:
None

Recommendations:
None

Additional comments

Positive impacts:
None

Potential negative impacts:
None

Recommendations:
- That investigation into limiting numbers of additional takeaway food outlets within certain areas of the Borough is continued, and that appropriate measures are incorporated within the Core Strategy or Supplementary Planning Documents to deal with this in future, alongside investigation of other potential restrictions e.g. licensing of premises.

Comment: The Council considers that the level of detail required in this regard is not suitable to be provided in a document such as the Core Strategy, which has a strategic focus. It is therefore the Council’s intention to consider a more bespoke approach with regard to the suitability and function of different retail uses via the subsequent Local Plan: Site Allocations and Development Policies document and / or an additional SPD (if required).

Further recommendation: That the future Local Plan: Site Allocations and Development Policies document or additional SPD (if required) refers to the need to consider a more bespoke approach with regard to the suitability and function of different retail; uses including limiting the numbers of additional takeaway food outlets within certain areas of the Borough.
Conclusions

2.8.11 The Interim HIA recognised that there were difficulties in promoting access to healthy food through the Core Strategy given the lack of national planning policy and guidance relating to this area. However, it is possible that in future this issue will be much more prevalent and therefore it is important to ensure that the Core Strategy is prepared for this.

2.8.12 The Interim HIA found that the Core Strategy Preferred Options Report did reflect some of the HUDU best practice around encouraging access to healthy food, for example, through the encouragement of new convenience retail within some of the most deprived areas within the Borough. However, it was felt that the document could go further in recognising the importance of local food production as a function of greenspace and also in promoting markets and social enterprise within the Borough. In addition, the issue of tackling takeaway food outlets should continue to be explored and appropriate measures incorporated as part of the Local Plan and/or other Council plans and strategies.

2.8.13 Comments received from the Council’s Policy, Impact and Intelligence Division in relation to the these recommendations from the Interim HIA generally suggest that the Core Strategy is not an appropriate place to contain detailed policy advice in relation to food access. It is therefore proposed that the future Local Plan: Site Allocations and Development Policies document refers to the need to consider a more bespoke approach with regard to the suitability and function of different retail uses including:

- provision of a suitable retail environment for affordable, fresh produce, particularly in some of the more deprived areas of the Borough; and
- limiting the numbers of additional takeaway food outlets within certain areas of the Borough.

2.8.14 In addition, it is proposed that the Council considers other opportunities to encourage the provision of food within areas where access to fresh food and diet are particularly poor, for example, through Asset Management.
2.9 Access to work

2.9.1 The following extract from the Healthy Urban Development Unit (HUDU) Checklist suggests the potential impact of planning on access to work and health.

"Health Benefit

2.9.2 Job security and simply having a job can increase health and wellbeing, as well as making it easier to pursue a healthy lifestyle. Income is one of the strongest and consistent indicators of health and disease in public health research. Further, job satisfaction, a sense of making a valuable contribution and wider social networks through work are all positive health contributor factors. Conversely, unemployed people and those on low income suffer an increased risk of ill health, mental health problems and even premature death.

Positive effects of planning

2.9.3 Urban planning linked to clear strategies for economic regeneration, allocation of appropriate sites and coordination of infrastructure provision can assist by facilitating attractive opportunities for businesses, encourage diversity in employment and ensure that local jobs are retained. Equitable transport strategies can also play an important part in providing access to job opportunities. The provision of local work can encourage shorter trip lengths and thus reduce emissions from transport and enable healthy walking or cycling options to be pursued. Access to other support services, notably childcare, can make employment opportunities easier to access for a significant segment of the population.

Potential negative effects of planning

2.9.4 Planning can hamper the provision of job opportunities. Employment opportunities created in inaccessible locations or a lack of job variety in a community can negatively affect health and mental wellbeing both directly and indirectly. Further, a general lack of infrastructure can make places less competitive or attractive to business location."

(Extract ends)

Local context

2.9.5 Around 56,500 people are employed in Knowsley. Manufacturing accounts for a relatively high proportion of employment opportunities in Knowsley reflecting the importance of key sectors such as advanced manufacturing and engineering. Public services have also expanded and Whiston Hospital is one of the Borough's largest employers. The Council has recognised the need to broaden the employment base and target growth sectors including business services, ICT, creative, tourism, leisure, financial services, communications, logistics and distribution.

Local need
2.9.6 Key issues in relation to access to work within Knowsley include:
- slowing rates of economic growth in the last few years and relative reliance on specific economic sectors (manufacturing and public services);
- relatively low average income levels of Knowsley's residents in comparison to those working in Knowsley (implying high earners commute into Knowsley);
- comparatively low business start up rates; and
- constrained land supply to meet long term economic development needs.

2.9.7 Key opportunities include:
- regeneration opportunities in Knowsley Industrial Park and the other industrial areas;
- Capitalisation on excellent transport accessibility of Knowsley's industrial areas by road and rail (including the Knowsley Rail Freight Terminal); and
- maximising benefits from the Liverpool Super Port and Liverpool John Lennon Airport master plan proposals.

2.9.8 In relation to access to work, the emerging Joint Strategic Needs assessment (JSNA) states that key needs for Knowsley include:
- increasing employment at a time of reducing support services and potential job losses, particularly (but not solely) in the Public Sector;
- reducing benefit claims; and
- increasing work skills and educational attainment.

Relevant Policies

2.9.9 Policies relating to access to work are located within several different places within the Core Strategy:
- **CS1 Spatial Strategy for Knowsley** (in part) covers the spatial development priorities and principal regeneration areas within the Borough.
- **CS2 Development Principles** (in part) covers the need to increase business productivity and employment within Knowsley.
- **CS4 Economy and Employment** which covers the overall Employment Development Strategy, the scale and distribution of development for employment uses, phasing and release of land for employment uses, town centre employment uses and the safeguarding of existing employment land.
- **CS7 Transport Networks** which covers proposals for the maintenance and enhancement of transportation networks in Knowsley and across the City-region, including access to employment areas.

Identification of impacts

2.9.10 Potential impacts in relation to each of the above policies are outlined within this section:

**CS1 Spatial Strategy for Knowsley (in part)**
Positive impacts:
- The enhancement of existing employment sites and provision of a range of sites and premises for new employment clearly supports the creation of new jobs within the Borough. In addition the support for new development within Principal Regeneration Areas encourages the creation of jobs within some of the more deprived areas of the Borough where unemployment is currently high. These overarching measures support the best practice outlined within HUDU document.

Potential negative impacts:
None

Recommendations:
None

CS2 Development Principles (in part)

Positive impacts:
- CS2 supports improving business productivity and employment levels and reducing economic inequalities within Knowsley and other parts of the UK. This again supports advice given in the HUDU document.

Potential negative impacts:
None

Recommendations:
None

CS4 Economy and Employment

Positive impacts:
- CS4 promotes the provision of land to meet employment development needs, improved accessibility to a range of jobs through improved transport linkages and addressing skills and educational barriers. This strongly supports the HUDU best practice.
- Encouraging the zoning of employment uses within CS4 (ii) can support additional services within areas such as public transport and childcare.
- CS4 (iv) promotes the location of “town centre” employment uses, primarily within existing town centres, which will ensure the accessibility of these locations. In addition employment in these areas will also support the viability of town centre and support additional services which employees may required, for example, childcare and health services.

Potential negative impacts:
• CS4 contains the caveat that Green Belt land could be used for employment uses, where principles set out in CS2 and CS5 are met. Depending on the location of these sites, there may be significant implications around the accessibility of the jobs created for those without access to a vehicle, as well as other issues around the impact on biodiversity, etc. These issues are explored further in different sections of this report and it is therefore recommended that further Health Impact Assessments be carried out on major developments on sites proposed for review and potential release from the Green Belt for employment or other uses.

**Recommendations:**

• That further Health Impact Assessment work is carried out on major developments on sites proposed for review and potential release from the Green Belt for employment or other uses.

**Comment:** This relates to the Core Strategy’s evidence base, not Policy CS4.

**Further recommendation:** Criteria be developed to govern where HIA would be applied to sites within the Green Belt potentially released for employment use and other use and this will fall within guidance separate to the Core Strategy.

• That a reference be made to within CS4 (i) Point 3 to emphasise the need for high quality employment and work places within the Borough which are not detrimental to human health and actively promote a healthy workforce.

**Comment:** This is noted, however, it is considered that this issue is too detailed for inclusion in the Core Strategy. It is suggested that issues relating to the design and setting of employment sites in creating healthy workplaces is considered within the emerging Design Quality in New Development SPD.

**Further recommendation:** That issues relating to the design and setting of employment sites in creating healthy workplaces is considered within the emerging Design Quality in New Development SPD.

• That within CS4 (iii), accessibility by sustainable modes of transport is made a factor within the proposed phasing of release of land for employment uses. In addition, that this section is expanded upon to include ensuring a supply of business start-up premises around the Borough.

**Comment:** No changes made although sustainability is a consideration for the location of sites not for the phasing of delivery of those sites.

• That opportunities to provide additional services which employees may require such as childcare and health care are encouraged within employment areas such as industrial and businesses parks which are away from traditional town centres.

**Comment:** This is contrary to Policy CS4 (v) “Safeguarding of Existing Employment Land”

• That the need to promote new and emerging types of businesses e.g. the Knowledge Economy is encouraged, in order to diversify the range of jobs available within the area.

**Comment:** Policy CS4 (i) bullet 1 supports emerging employment sectors.

• That opportunities to encourage working from home and improvements within digital communications and telecommunication should be explored (although possibly within the Infrastructure Delivery Plan, Design Quality in New Development or other Supplementary Planning Document, as appropriate).
Comment: A new bullet point “Encourage home working through improvements to digital communications and telecommunications infrastructure;” has been added to CS4(i) “Overall Employment Development Strategy”

- That reference to the Council's emerging Economic Regeneration Strategy is mentioned where and if appropriate.

Comment: Economic Regeneration Strategy is mentioned as a delivery mechanism for Policy CS4

CS7 Transport Networks

Positive impacts:
- CS7 supports the principles of accessibility to employment areas by a range of travel modes. This is in line with HUDU best practice and the requirement of larger developments to have transport assessment and/or travel plans.

Potential negative impacts:
None

Recommendations:
None

Additional comments
None

Conclusions

2.9.11 During the Interim HIA break out sessions the group recognised the need for a long term corporate approach to job provision within the area. It was also noted that the Borough is reliant on a number of large employers and could therefore benefit from opportunities to diversify and encourage new businesses and entrepreneurship.

2.9.12 In general the Interim HIA found that the Core Strategy Preferred Options report largely supported the principles within the HUDU guidance relating to access to work, by ensuring that employment opportunities were directed to both existing employment areas and also areas with high levels of unemployment. This was supported by clear encouragement of sustainable mode of transport to access these areas. However, it was felt that the Core Strategy could go further by promoting the development of new emerging employment sectors, social enterprise and business start up, and the need for employment areas to be supported by additional services such as childcare. There comments were considered by the Council’s Policy, Impact and Intelligence Division, although it was largely felt that these areas where already sufficiently covered either within the policies itself or supporting text.

2.9.13 The possible release of land currently within the Green Belt for employment uses also raised some concerns in terms of accessibility and, as mentioned previously, further Health Impact Assessment work was recommended on any major sites within
this category as and when they come forward for development. Similar to previous policy areas where this issues was raised, it is further recommended that:

- Criteria be developed to govern where HIA would be applied to sites within the Green Belt potentially released for employment use while recognising that this will fall within guidance separate to the Core Strategy.

2.9.14 In addition, it is also recommended that issues relating to the design and setting of employment sites in creating healthy workplaces is considered within the emerging Design Quality in New Development SPD.
2.10 Social Cohesion and Social Capital

2.10.1 The following extract from the Healthy Urban Development Unit (HUDU) Checklist suggests the potential impact of planning on social cohesion and social capital.

“Health benefits

2.10.2 Friendship and supportive networks throughout the community can help the individual at home and at work by reducing depression and chronic illness as well as speed recovery after illness. This can lead to greater fulfilment. Fragmentation of social structure can lead to ghettos according to socio-economic status, age and race and this can contribute to isolation and insecurity. Poor health and premature death can be reduced by cutting levels of poverty. The harm to health comes not only from material deprivation but also from the social and psychological problems of living in poverty especially for those who are elderly. Voluntary groups for instance can support those that are isolated and disconnected, and provide meaningful interaction which builds social capital.

Positive effects of planning

2.10.3 Urban planning cannot create local community or cohesive social networks. However, social cohesion can be facilitated by creating safe and permeable environments with natural social foci where people can meet informally. Mixed-use developments in town centres and commercial environments as well as residential neighbourhoods can help widen social options. The provision of a range of diverse local employment opportunities (paid and unpaid) can also improve both social cohesion and social capital.

Potential negative impacts of planning

2.10.4 Social cohesion can be undermined by insensitive housing redevelopment and dispersal of residential communities. It is also undermined by roads severing community links and constructing barriers to pedestrian connectivity and by larger, intimidating commercial schemes. Planning may result in the loss of community facilities for other uses. Planning does not directly affect income but does have many indirect effects. The planning system can be used, for example, to hinder or to help the process of providing a range of facilities and providing opportunities for improving levels of equity in areas such as housing and employment.”

(Extract ends)

Local context

2.10.5 Knowsley’s Place Survey 2008 indicates that 57.9% of residents feel that they belong to their neighbourhood. However this figure is less than the North West and England averages (59.5% and 58.7% respectively). Nearly three quarters of residents (72.2%) are satisfied with their local area, but again this figure is less than the North West (76.9%) and England (79.7%). The majority of residents over 65 are
satisfied with their home and neighbourhood (83.9%), and the proportion is higher than the North West average (82.5%) and the same as the England average.

2.10.6 Only 14% of respondents help out by participating in regular volunteering. This is 6% less than across the North West and 7% lower than the England average. Only 1 in 10 residents get involved in groups that make decisions that affect their local area. Again this figure is less than the North West and England averages.

2.10.7 The percentage of people in Knowsley who believe people from different backgrounds get on well together in their local area is 71.9%, slightly below the North West and England average (73.6% and 76.4% respectively). However, the proportion that believe people in the area treat one another with respect and consideration (45.9%) is higher than the North West (34.9%) and England (31.9%). Approximately 20% of residents in Knowsley agree that parents take responsibility for the behaviour of their children; this is 10% below the England average of 30%.

2.10.8 Nearly one third of residents (32.2%) perceive the support received by older people to be enough for them to live independently. This figure is higher than both the averages across the North West (31.9%) and England (30%).

2.10.9 The 2009 North West Mental Wellbeing Survey suggests that low levels of mental wellbeing can be linked to wider factors, as detailed through the emerging Joint Strategic Needs Assessment (JSNA). The WEMWBS survey suggests that Knowsley residents have relatively low mental wellbeing, have relatively low incomes, are generally less likely to have healthy lifestyles and are more like to be unemployed. Residents are also less likely to join sports clubs, religious groups or educational groups. However, the survey also showed that Knowsley residents report positively in many indicators used to demonstrate area or community wellbeing such as local identity and belonging, satisfaction with their local area, feeling safe in their home at night and outdoors in the day. They had the highest likelihood of talking regularly with neighbours, being able to find help in a crisis and likelihood of finding help if ill.

**Local need**

2.10.10 The emerging Core Strategy recognises the need to:
- Narrow the gap in levels between deprived areas and other parts of Knowsley in terms of both income and social capital.
- Ensure new development supports community involvement, cohesion, cultural activities and self-improvement, in order to have a positive impact on health and wellbeing within Knowsley.

2.10.11 Key opportunities include:
- The ability for local residents to make informed lifestyle choices and participate in community activities
Relevant Policies

2.10.12 Policies relating to social cohesion and social capital are located within several different places within the Core Strategy:

- **CS2 Development Principles** (in part) deals with reducing social inequalities.
- **CS15 Delivering Affordable Housing** (in part) covers the delivery of affordable housing which is integrated within market sector housing.
- **CS16 Specialist and Supported Accommodation** (in part) aims to develop integrated social well-being, housing and planning strategies which seek to holistically address specialist housing needs and demands.
- **CS18 Accommodation for Gypsies and Travellers and Travelling Showpeople** (in part), deals with integration of communities.
- **CS19 Design Quality and Accessibility in New Development** (in part) covers the need to create areas for social interaction
- **CS27 Planning for and Paying for New Infrastructure** (in part) deals with funding for community facilities as part of developments.

Identification of impacts

2.10.13 Potential impacts in relation to each of the above policies are as follows:

**CS2 Development Principles (in part)**

*Positive impacts:*
- CS2 refers to the need to tackle the causes of deprivation and disadvantage and narrow the gap between the richest and poorest neighbourhoods, including through reducing inequality. These overarching principles are in line with HUDU best practice.

*Potential negative impacts:*
None

*Recommendations:*
None

**CS15 Delivering Affordable Housing (in part)**

*Positive impacts:*
- The recognition that affordable housing should be fully integrated with and not distinguishable from market housing is a positive in terms of social cohesion.
Potential negative impacts:
None

Recommendations:
None

CS16 Specialist and Supported Accommodation (in part)

Positive impacts:
- CS16 encourages support for non-accommodation based interventions, intended to achieve sustainable independence for individuals but also social well-being strategies which seek to holistically address specialist housing needs and demands. This encourages social cohesion and capital in line with HUDU best practice.

Potential negative impacts:
None

Recommendations:
None

CS18: Accommodation for Gypsies and Travellers and Travelling Showpeople (in part)

Positive impacts:
- CS18 aims to ensure that accommodation is located in appropriate areas for a recognised vulnerable group within society.
- Future management and maintenance of sites is considered in line with HUDU evidence.

Potential negative impacts:
- Sites may be perceived as having a negative impact by surrounding communities, therefore leading to possible community cohesion issues which may negatively affect the wellbeing of all communities affected.

Recommendations:
- Policy CS18 could outline the opportunities presented by planning and health colleagues working together to address social exclusion issues and provide outreach and other services to the Gypsy and Traveller and Travelling Showpeople communities within the area where appropriate.

Comment: The supporting text for CS18 has been amended to reflect this more effectively.

CS19 Design Quality and Accessibility in New Development (in part)

Positive impacts:
The importance of creating places which encourage social interaction is recognised and this can reduce crime and encourage community cohesion.

*Potential negative impacts:*
None

*Recommendations:*
None

**CS27 Planning for and Paying for New Infrastructure**

*Positive impacts:*
- CS27 sets out how new infrastructure will be planned and paid for, including the requirement of developer contributions for the provision of on-site infrastructure to support new development and strategic infrastructure to support local communities and borough-wide development. These contributions could be highly beneficial to local communities, however, limited information is currently given about how this money will be allocated and spent.

*Potential negative impacts:*
None

*Recommendations:*
- That the Infrastructure Delivery Plan (IDP), when developed in full, properly reflects the needs of local communities and ensures that developer contributions are allocated and spent in ways which will support improvements to social cohesion and capital. In addition, local communities should also be involved in the development of the IDP where appropriate, through public consultation and involvement in stakeholder groups.

*Comment:* The Council’s approach to preparation of the IDP, and subsequent documents (e.g. CIL charging schedule) will reflect priorities in the Core Strategy, including meeting community needs and providing appropriate social, physical and environmental infrastructure. Local communities will continue to be involved in the IDP through its role as a supporting document for the Core Strategy, and will also be involved in the development of the Council’s approach to future planning obligations.

**Additional comments**

*Positive impacts:*
None

*Potential negative impacts:*
None
**Recommendations:**

- That increased community engagement is undertaken within all aspects of regeneration, investment and development. Opportunities for this include through the design of new buildings and service provision and through investment and long-term maintenance of parks and open spaces (‘Friends of’ groups, allotment groups etc). This should be encouraged throughout the Core Strategy as a whole.  

  **Comment:** This is noted, however, community engagement has been undertaken at every stage of the production of the Core Strategy. When developers are drawing up their proposals, they are required by law to consult the community. It is therefore considered that the Core Strategy already goes as far as possible within this respect.

- Leisure and cultural facilities can also provide a focus for social interaction, and increased reference to these facilities could be made throughout the Core Strategy.  

  **Comment:** The Council supports its approach in referring to leisure and culture within the hierarchy of centres and retail strategy (CS6) given both are classified as main town centre uses.

- That further encouragement be given to new start up businesses and social enterprise, for example, within CS4; and also, voluntary and community groups such as ‘Friends of’ groups within CS8 and CS21.  

  **Comment:** A new bullet point “Support new start up businesses including social enterprise” has been added to CS4(i) “Overall Employment Development Strategy”

- That consideration be given to where there is a need for new community facilities and where consolidation and investment is required in other areas. It is recognised that this is an area which the Council may not have tackled on a borough wide basis yet and therefore would be difficult to convert into policy at this stage.  

  **Comment:** This is considered as part of the IDP and the assembly of evidence to support the implementation of future planning obligations within Knowsley.

**Conclusions**

2.10.14 As part of the Interim HIA discussions within the breakout group responsible for social cohesion and social capital focused around the varying ability of communities within the Borough to help themselves, amidst increasing pressure from central government for communities to reduce reliance on the public sector and move towards community-led solutions.

2.10.15 In relation to the HUDU evidence, the Core Strategy will help to promote social cohesion through the design of new housing and open space. However, it is suggested that more could be done to promote community engagement within the development of new plans and proposals, and community involvement within the future management of areas, in particular open space. Encouragement of social enterprise and start-up businesses would also be a positive, along with a recognised strategic approach to the provision of new community facilities and investment in others.
The above recommendations have largely been accounted for within the proposed Core Strategy Submission Document and no further recommendations have been made.
2.11 Resource Minimisation

2.11.1 The following extract from the Healthy Urban Development Unit (HUDU) Checklist suggests the potential impact of planning on resource minimisation and health.

"Health benefits

2.11.2 Reducing or minimising waste including disposal, processes for construction as well as encouraging recycling at all levels potentially not only improves the quality of the environment but can also improve human health directly and indirectly.

Positive effects of planning

2.11.3 Planning can impose standards and criteria on new developments involving hazardous waste disposal, recycling and domestic waste. It can ensure that hazardous waste is disposed of correctly, as well as ensure that local recycled and renewable materials are used whenever possible in the building construction process. Redevelopment on brownfield sites or derelict urban land also ensures that land is effectively used, recycled and enhanced. Through encouraging reduction, reuse and recycling, resource minimisation can be better realised and contribute towards a better environment. Examples of various standards to consider include BREEAM (Building Research Establishment Environmental Assessment Method) and CEEQUAL (Civil Engineering Environmental Quality assessment) which are benchmarking tools for non-residential buildings and infrastructure projects.

Potential negative impacts of planning

2.11.4 If left unchecked, disposal of significant hazardous waste can have serious impacts on health on those communities living near to collection or disposal sites. In context of redevelopment sending out waste to be sorted or disposed from a site can increase vehicle movements, emissions and cause significant disruption including noise and dust which can contribute towards health problems for residents. There are also ecological impacts (striping of materials, mining for minerals etc) through excessive use of resources from a scarce global environment."

(Extract ends)

Local context

2.11.5 The Liverpool City Region (including Knowsley) produces significant amounts of municipal, commercial and industrial, construction, agricultural and hazardous waste. The Council is preparing a joint waste plan with its sub-regional partners, which will guide the scale, location and type of facilities required to manage all types of waste in Merseyside and Halton. This will include identifying proposed sites to be allocated in each authority area for development of new waste management and treatment facilities.
2.11.6 The biological and chemical quality of the rivers in the Borough has improved but is still below the regional average.

2.11.7 Knowsley has a long history of extraction of minerals such as coal and clay for brick making. With the exception of Cronton Clay Pit, the operations have now ceased.

Local need

2.11.8 Key issues in relation to resource minimisation within Knowsley include:
- the need to support the emerging Merseyside and Halton Joint Waste Local Plan document to tackle waste management and reduce the amount of waste being sent to landfill; and
- the potential need to safeguard minerals resources to allow possible future extraction.

2.11.9 Key opportunities include:
- maintenance and improvement of environmental assets and current environmental quality levels.

Relevant Policies

2.11.10 Policies relating to minimising resources are located within several different places within the Core Strategy:
- **CS2 Development Principles** (in part) covers making the most efficient use of available infrastructure and resources.
- **CS22 Sustainable and Low Carbon Development** (in part) covers the promotion of sustainable waste behaviour.
- **CS25 Management of Mineral Resources** covers minimising the need for mineral extraction, mineral safeguarding areas and proposals for mineral extraction.
- **CS26 Waste Management** covers the management of waste within the Borough.

Identification of impacts

2.11.11 Potential impacts in relation to each of the above policies are:

CS2 Development Principles

**Positive impacts:**
- CS2 (v) encourages the most efficient use of available resources by supporting proposals which make the most of existing infrastructure networks, that support prudent and efficient management of natural and man-made resources and promote sustainable construction and efficiency in resource use. This fully supports evidence within the HUDU checklist.
Potential negative impacts:
None

Recommendations:
None

**CS22 Sustainable and Low Carbon Development (in part)**

Positive impacts:
- CS22 (i) promotes sustainable waste behaviour in new and existing development in line with HUDU guidance.

Potential negative impacts:
None

Recommendations:
- That CS22 (i) make reference to the efficient re-use of materials and use of recycled materials within developments.
  
  Comment: No change as the efficient use of materials is already addressed by part 1 (d).

**CS25 Management of Mineral Resources**

Positive impacts:
- By encouraging minimisation of the need for mineral extraction, CS25 supports best practice from the HUDU. However, it is felt that the policies could be strengthened.

Potential negative impacts:
- CS25 (ii) and (iii) suggests that there is potential for future mineral extraction within the Borough and/or development within areas where there may be future mineral extraction. In either case there would be potential for negative health impacts on the surrounding area through increased noise, dust, vibrations and vehicular movement. Any major development proposal of this nature, therefore, should be subject to future Health Impact Assessment work as part of the planning application process.

Recommendations:
- That CS25 (i) the requirement for ‘a proportion of construction aggregates…from recycled or secondary sources’ is strengthened to say ‘a significant proportion’ or something similar.

  **Comment:** The current wording of the policy carries enough weight to ensure development uses appropriate amounts of recycled and secondary aggregated materials. The Council’s emerging Sustainability in Design and Construction SPD will add further detail and guidance on this issue.
Further recommendation: That the Council’s emerging Sustainability in Design and Construction SPD will add further detail and guidance on appropriate amounts of recycled and secondary aggregated materials.

- That major future mineral extraction work and/or major development within areas of existing or proposed mineral extraction (e.g. backfilling) be subject to separate Health Impact Assessments.

  Comment: The existing policy working provides a satisfactory level of higher level guidance to support the planning application process. Further detailed guidance, and as requirement for development specific HIAs if deemed appropriate, will be delivered by the Local Plan: Site Allocations and Development Policies.

Further recommendation: That criteria be developed to govern where HIA would be applied to sites of future mineral extraction work and/or major development within areas of existing or proposed mineral extraction (e.g. backfilling) and this will fall within guidance separate to the Core Strategy.

CS26 Waste Management

Positive impacts:
- By promoting sustainable waste management through good design within new developments, use of recycled materials and sustainable transport of waste, Policy CS26 adheres to the guidance set out by the HUDU.

Potential negative impacts:
None

Recommendations:
- That within CS26 (3), ‘re-use’ of materials is added to strengthen this point.
  Comment: Policy CS26 has been amended to reflect this.
- That within CS26 (5), the term ‘impacts’ are further explained, for example, would it be clearer to state ‘negative impacts’ or maybe explain what these impacts may be.
  Comment: Policy CS26 has been amended to state that negative impacts only should be minimised.

Additional comments

Positive impacts:
None

Potential negative impacts:
None

Recommendations:
• That reference within the Core Strategy is made to prioritising the redevelopment of brown field land, not just land within existing urban areas. This may be most appropriate within CS1 or CS2 and could be reinforced within policy CS22 or CS26.

Comment: It is national policy to prioritise development of brown field land before greenfield and this should not be repeated within the Core Strategy. There is limited brownfield land left in Knowsley hence the potential need to release of some Green Belt. Other policies have been put in place to protect important landscape.

Conclusions

2.11.12 The Interim HIA found that best practice within the HUDU checklist is largely recognised in relation to resource minimisation within the Core Strategy. Reference to efficient use of natural and man-made resources, sustainable waste management and sustainable transport of waste confirm that the wider impacts of resource minimisation have been considered. This area could be strengthened slightly with the recognition that ‘re-using’ materials is also an important aspect of resource minimisation and through a reference to the development of brown field sites over green field sites.

2.11.13 Two further recommendations have been added to the Final HIA, following comments received above from the Council’s Policy, Impact and Intelligence Division. These are as follows:

• That the Council’s emerging Sustainability in Design and Construction SPD will add further detail and guidance on appropriate amounts of recycled and secondary aggregated materials.

• That criteria be developed to govern where HIA would be applied to sites of future mineral extraction work and/or major development within areas of existing or proposed mineral extraction (e.g. backfilling) while recognising that this will fall within guidance separate to the Core Strategy.
2.12 Climate Change

2.12.1 The following extract from the Healthy Urban Development Unit (HUDU) Checklist suggests the potential impact of planning on climate change and health:

"Health benefits

2.12.2 Climate change will cause warmer winters and hotter summers. Addressing climate change including mitigation measures and carbon stewardship can therefore potentially help to reduce the health impacts of climate change, including vulnerability to flooding and vulnerable groups (such as the elderly) becoming ill as a result of extreme cold or heat. Developments that take advantage of sunlight, tree planting and accessible green/brown roofs also have the potential to contribute towards mental wellbeing of residents.

Positive effects of planning

2.12.3 Urban planning can affect the rates of human activity including, for example emission of greenhouse gases, by influencing energy use in buildings, transport and by developing renewable energy sources. Building sustainability and environmental considerations in at the early planning stage of a project and use of standards such as the Code for Sustainable Homes will help achieve economic, social and environmental goals simultaneously. Using sustainability as a key principle will create smarter and more successful plans and projects.

Potential negative impacts of planning

2.12.4 Planning can contribute to climatic problems by failing to consider policies related to location, materials, designs or technologies which help to reduce energy consumption (using sunlight, energy conservation in construction, thermal insulation of buildings, etc.) or reduce the environmental impact of energy generation. Further, building on flood plain areas may also lead to potential increased risk of flooding, while non-consideration of micro-climate could contribute to development which is neither suitable nor adaptable for its environment."

(Extract ends)

Local context

2.12.5 Knowsley contains 306 ha of land which has a high or medium risk of flooding. The majority of the areas are in the Green Belt with only just over one percent of properties in the urban area are affected.

Local need

2.12.6 Key issues in relation to climate change within Knowsley include:

- The need to consider the implications of flood risk in locating and phasing new development;
• the implications of hotter summers/more heat waves and how this can be addressed within developments; and
• the need to reduce carbon emissions from development in Knowsley, in order to play our part in reducing the impact of future climate change and related health impacts.

2.12.7 Key opportunities include:
• maintenance and improvement of environmental assets and current environmental quality levels; and
• reduce energy requirements of new development.

Relevant Policies

2.12.8 Policies relating to minimising resources are located within several different places within the Core Strategy:
• Policy CS2 Development Principles (in part) covers reducing carbon emissions and adapting to the effects of climate change.
• Policy CS22 Sustainable and Low Carbon Development which covers sustainable construction principles, sustainable construction targets, priority zones and decentralised energy networks, carbon compensation fund and planning application requirements.
• Policy CS23 Renewable and Low Carbon Infrastructure
• Policy CS24 Managing Flood Risk

Identification of impacts

2.12.9 Potential impacts in relation to each of the above policies are:

CS2 Development Principles (in part)
Positive impacts:
• CS2 (ii) encourages development which overall will reduce carbon emissions, be adaptable to the impact of climate change and future national targets. This is in line with the HUDU guidance.

Potential negative impacts:
None

Recommendations:
• That reference to the North West Sustainability Checklist for Developments is changed to something more current (the North West Regional Assembly has now been disbanded), for example, a reference to the Sustainability in Design and Construction Supplementary Planning Guidance or national recognised standard such as the Code for Sustainable Homes or BREEAM.

Comment: Policy CS2 has been amended to future-proof the approach in relation to meeting minimum sustainability standards. This includes removing reference to specific guidance documents, and instead referring in general to minimum existing
standards. Policy CS22 and CS23 expand on this, as indicated in the “policy links” section under policy CS2.

- That reference to the use of ‘new technology’ in order to reduce emissions is considered.
  **Comment:** Noted. The role of new technology in minimising carbon emissions and helping to manage the impacts of climate change has been recognised in the policy wording of CS2.

**CS22 Sustainable and Low Carbon Development**

**Positive impacts:**

- In encouraging considerate and efficient design of new development, including limiting energy use, efficient use of landscaping and water, and renewable energy, CS22 is in accordance with HUDU best practice.

- The introduction of sustainable construction targets, through the Code for Sustainable Homes and BREEAM is also seen as a positive, in particular with housing built after 2016 to be ‘zero carbon’.

- Reference to the encouragement of decentralised energy networks is welcomed, however, opportunities to strengthen this paragraph to ensure that major developments actually install such technology should be considered.

**Potential negative impacts:**

None

**Recommendations:**

- That in addition to ‘local suppliers’, reference is also made to ‘local materials’ within (7). This will not only support local businesses but will also ensure that materials do not use large amount of carbon through the transportation process. **Comment:** No changes as it is the intention of part (d) of CS22 to ensure that resources are used in the most effective and sustainable way. To require developments to use “local materials” would be overly onerous and restrictive.

- That a reference to encouraging active travel (walking and cycling) through the design, layout and location of development by added to add strength to this issue. **Comment:** No changes as sustainable transport is addressed by CS19 Design Quality and Accessibility in New Development.

- Consideration should be given to encouraging buildings undergoing refurbishment, including historic buildings, to apply standards such as BREEAM and the Code for Sustainable Homes, where appropriate. **Comment:** No changes as there is currently no evidence base to support this type of requirement. There may be opportunities to introduce localised and/or building specific targets for the refurbishment of buildings where the opportunity and need is apparent and can be evidenced.

- That opportunities to strengthen CS22 (iii) to encourage and facilitate more installation of decentralised energy networks is considered. **Comment:** This is noted and welcomed, but is covered in the aim of part 7 – 9 of CS22.
• Supporting text for CS22 could outline not only the environmental benefits of reduced energy consumption but also the social and health benefits in terms of reducing fuel poverty and financial exclusion (however, this may be more appropriate within the Design Quality in New Development or Sustainability in Design and Construction Supplementary Planning Document).

**Comment:** This is noted and welcomed but these matters have been explored and are documented in the Local Plan evidence base.

**CS23 Renewable and Low Carbon Infrastructure**

**Positive impacts:**
• CS23 positively supports the development of renewable energy and local carbon infrastructure within the Borough, where there is no significant harm to natural resources, historical assets, amenity and living conditions etc. This is particularly appropriate wording as the policies recognises the benefits of renewable energy but also seeks to mitigate against negative health impacts which this type of development may also have.

**Potential negative impacts:**
None

**Recommendations:**
• That work is undertaken with the Scientific Officer to agree an approach to the use of Biomass within new developments in the Borough.

**Comment:** No changes as this will be addressed when more detailed guidance within the Sustainability in Design and Construction SPD is prepared.

**Further recommendation:** That the Council’s emerging Sustainability in Design and Construction SPD or other appropriate documents will add further detail and guidance on appropriate use of biomass.

**CS24 Managing Flood Risk**

**Positive impacts:**
• CS24 recognises the need for new development to reduce the extent and impact of flooding through development of sites at least risk of flooding in the first instance, requiring Flood Risk Assessments, mitigation measures, and Sustainable Drainage Systems where possible. Long term maintenance of these measures is also required. This is welcomed and supports the HUDU guidance.

**Potential negative impacts:**
None

**Recommendations:**
• That the term ‘SFRA’ within Point 3 is explained.

**Comment:** Strategic Flood Risk Assessment will be written in full.
• In addition to mitigation measures to manage the risk of flooding, consideration should be given to the actual design of buildings on the site to reduce the impact of flooding on the buildings themselves and their inhabitants. However, it is recognised that this may be more appropriate within Policy CS19, with additional guidance given with the Design Quality in New Development Supplementary Planning Document.

   **Comment:** Design of buildings on the site to reduce the impact of flooding on the buildings is introduced into CS19.

**Additional comments**
None

**Conclusions**

2.12.10 In general, the Interim HIA found that the guidance within the HUDU checklist was largely taken into account across several of the policies within the Core Strategy Preferred Options Report. Opportunities to encourage sustainable and local carbon developments, development of renewable energy and mitigation against flood risk are largely taken into account.

2.12.11 Minor areas where improvements were recommended included the need to encourage the use of new and emerging technologies in reducing energy and the need to measure to be applied to the refurbishment of existing buildings as well as new development. In addition, the issue of promoting biomass within the Borough could be clarified.

2.12.12 The above recommendations have to some extent been taken into account within the Final HIA through changes and additions to wording of policies. Where this has not been the case, justification for this has been given. In addition, a further recommendation has been added as follows:

• That more detailed guidance is included within the emerging Sustainability in Design and Construction SPD, in relation to appropriate use of biomass.
2.13 Overall conclusion

2.13.1 This report provides a detailed account of the Health Impact Assessment of the Core Strategy to date. It includes an Interim HIA conducted on the Preferred Options Report; changes made a result of the Interim HIA; and policy development to the Proposed Submission Document.

2.13.2 This Final HIA report includes background information relating to health and planning; an introduction to both the Local Plan and Health Impact Assessment process, and the methodology applied in this assessment. The second half of the report details the findings of the Health Impact Assessment in the form of potential positive and negative implications of each of the identified policies and how they relate to the evidence provided in the Healthy Urban Development Unit Checklist ‘Watch out for health’. Recommendations suggested as part of the Interim HIA are then given, followed by the subsequent comments received in response from the Council’s Policy, Impact and Intelligence Division. These indicate the level of any changes (if any) that were made in order to produce the Local Plan: Core Strategy proposed Submission Document. Where the comments have resulted in further recommendations, these have been stated.

2.13.3 Overall, the Interim HIA concluded that the Core Strategy Preferred Options Report largely reflected the best practice given in the Healthy Urban Development Unit’s Checklist, in all of the areas considered. If implemented as stated, the Core Strategy would therefore have a generally positive impact on the health of Knowsley’s residents and workforce. Best practice was reflected particularly well in the areas of housing, accessibility and transport, resource minimisation and climate change.

2.13.4 Some areas of concern were raised at the Interim HIA stage. These largely focused around the proposed release of land within the Green Belt for development as it give rise to potential implications for accessibility, neighbourhood amenity and restricted opportunities for physical activity. Recommended changes to these policy areas were then suggested as part of the Interim HIA.

2.13.5 A significant number of the recommendations resulted in changes being made to the Core Strategy. Where changes have not been made, reasoned justifications have been given with a more appropriate process for taking forward the recommended action being suggested.

2.13.6 This Final HIA makes a series of further recommendations which are summarised below. These do not suggest any further changes to the Core Strategy proposed Submission Document, but identify other related work to ensure that health and wellbeing are embedded within an appropriate Local Plan document. These will need to be considered as the Council progresses additional planning policy documents.
Summary of Further Recommendations:

**Further Health Impact Assessments**
- That guidance be developed, separate to the Core Strategy, to govern where further Health Impact Assessments would be applied to the following sites:
  - Future housing sites.
  - Edge or out of centre sites.
  - Large transport infrastructure proposals.
  - Schemes which involve major development proposals on any ‘Reserved’ or ‘Safeguarded’ Location within the Green Belt.
  - Sites of future mineral extraction work and/or major development within areas of existing or proposed mineral extraction.

**Local Plan: Site Allocations and Development Policies**
- That the future Local Plan: Site Allocations and Development Policies document considers:
  - a more bespoke approach to vacancy in local centres in order to encourage the development of new businesses and services.
  - a more bespoke approach with regard to the suitability and function of different retail uses including:
    - Provision of a suitable retail environment for affordable, fresh produce, particularly in some of the more deprived areas of the Borough.
    - Limiting the numbers of additional takeaway food outlets within certain areas of the Borough.
  - how to retain or encourage access to adjacent open/rural areas (e.g. footpaths) and preserve as many natural features of the original character of the landscape as possible (e.g. tree-lines and hedgerows).

- That Public Health is involved in further consultation to develop the Local Plan: Site Allocations and Development Policies document.

**Design Quality in New Development Supplementary Planning Document**
- That more detailed guidance be included within the emerging Design Quality in New Development SPD, in relation to the following issues:
  - the importance of creating legible environments where people can orientate themselves easily both within development sites and internally within buildings.
internal building design reflecting health objectives, for example, by placing stairs in a more prominent position than the lifts, making optimum use of views and natural light.

the importance of highway design in creating streets which encourage social interaction and play e.g. Home zones and/or the Manual for Streets.

consideration of the potential conflicts between aesthetic design quality and environmentally friendly design.

the design and setting of employment sites in creating healthy workplaces.

Sustainability in Design and Construction Supplementary Planning Document
- That more detailed guidance is included within the emerging Sustainability in Design and Construction SPD, in relation to appropriate:
  - Amounts of recycled and secondary aggregated materials within construction.
  - Use of biomass

Ensuring Choice of Travel Supplementary Planning Document
- That more detailed guidance be included within future versions of the Ensuring Choice of Travel Supplementary Planning Document, in relation to improving health and wellbeing of local people, by encouraging physically active means of travel and providing access to adequate healthcare facilities.

Noise
- Consideration be given to where noise issues could be considered as part of a future Local Plan document, as appropriate.

Access to fresh food
- The Council considers other opportunities to encourage the provision of food within areas where access to fresh food and diet are particularly poor, for example, through Asset Management.
**APPENDIX A: SUMMARY OF RECOMMENDATIONS FROM INTERIM HIA**

<table>
<thead>
<tr>
<th>PREFERRED OPTION</th>
<th>RECOMMENDATIONS</th>
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<tbody>
<tr>
<td><strong>CS1</strong>: Spatial Strategy for Knowsley</td>
<td>- Any new development of land within the Green Belt for housing should ensure that public services are accessible within reasonable distance by a range of transport modes, giving priority to walking and cycling.</td>
</tr>
</tbody>
</table>
| **CS2**: Development Principles        | - That Preferred Option CS2 is strengthened to ensure accessibility to public services for vulnerable groups is given appropriate consideration.  
  - It should be recognised that walking and cycling, although beneficial to human health, is not an appropriate means of transport for everyone and this could be emphasised within the supporting text of Preferred Option CS2.  
  - Whilst the principle that new development will have 'no negative impact upon flood risk, air quality, etc' is commendable, and a positive in terms of human health, it is questionable how realistic this is and how it would be measured and implemented. It is therefore recommended that this be reworded to take account of these issues.  
  - More specific guidance on noise levels should be included where appropriate (i.e. within the Core Strategy or Supplementary Planning Documents). Work to be undertaken with the Scientific Officer to make links to the Merseyside Noise Policy.  
  - That reference to the North West Sustainability Checklist for Developments is changed to something more current (the North West Regional Assembly has now been disbanded), for example, a reference to the Sustainability in Design and Construction Supplementary Planning Guidance or national recognised standard such as the Code for Sustainable Homes or BREEAM.  
  - That reference to the use of ‘new technology’ in order to reduce emissions is considered.                                                                                      |
| **CS3**: Housing Supply, Delivery and Distribution | - That a separate Health Impact Assessment be undertaken on all applications which fall outside the stated housing density parameters, where a residential scheme is for 15 units or more.  
  - That planning and health colleagues work together to better understand the changing health and housing needs of the Borough, to allow planning for the future. |
| CS4: Economy and Employment | • Any significant development being classified as edge or out of centre is subject to a separate Health Impact Assessment process. It is recognised that a process will have to be undertaken to define ‘significant development’, to ensure that the required HIAs are not too onerous for the development and case officers involved.  
• That CS4 be strengthened to recognise that the quality and connectivity of the retail environment is important to ensure that town centres are considered as a whole.  
• That further Health Impact Assessment work is carried out on major developments on sites proposed for review and potential release from the Green Belt for employment or other uses.  
• That a reference be made to ‘an appropriate range of high quality jobs’ within CS4 (i) Point 3 to emphasise the need for high quality employment within the Borough.  
• That within CS4 (iii), accessibility by sustainable modes of transport is made a factor within the proposed phasing of release of land for employment uses. In addition, that this section is expanded to include ensuring a supply of business start-up premises around the Borough.  
• That opportunities to provide additional services which employees may require such as childcare and health care are encouraged within employment areas such as industrial and businesses parks which are away from traditional town centres.  
• That the need to promote new and emerging types of businesses e.g. the Knowledge Economy is encouraged, in order to diversify the range of jobs available within the area.  
• That opportunities to encourage working from home and improvements within digital communications and telecommunication should be explored (although possibly within the Infrastructure Delivery Plan, Design Quality in New Development or other Supplementary Planning Document, as appropriate).  
• That reference to the Council’s emerging Economic Regeneration Strategy is mentioned where and if appropriate. |
| CS5: Green Belts | • That the Preferred Option be amended to highlight that a separate Health Impact Assessment could be undertaken on schemes which involve major development proposals on any ‘Reserved’ or ‘Safeguarded’ Location within the Green Belt, and that the recommendations of the HIA are incorporated within any development.  
• That new development within any ‘Reserved’ or ‘Safeguarded’ Locations should retain or encourage access to adjacent open/rural areas (e.g. footpaths) and preserve as many natural features of the original character of the landscape as possible (e.g. tree-lines and hedgerows).  
• To recognise that the Green Belt land is sometimes not perceived as an area which can be used for physical activity/recreation and therefore there are opportunities for colleagues within |
planning/regeneration and public health should work together to encourage more use of these areas and open space in general within Knowsley, also accounting for environmental considerations.

**CS6: Hierarchy of Centres and Retail Strategy**
- Investigate the potential of the Core Strategy to strengthen the strategic approach to the retention and/or enhancement of local service provision, particularly small shops (i.e. convenience goods).
- That where the Council owns vacant shops (largely within neighbourhood centres and not town centres), pro-active ways to encourage the development of new businesses and services are considered.
- That opportunities to encourage the establishment of new local businesses and particularly social enterprise which encourage the provision of food within areas where access to fresh food and diet are particularly poor, are explored. However, it is recognised that this may only really be achievable where the Council owns the business premises and that this may be outside the remit of the planning process.
- That the supporting text to CS6 references the need for provision of a suitable retail environment for affordable, fresh produce, particularly in some of the more deprived areas of the Borough.

**CS7: Transport Networks**
- That CS7 (i) is re-worded to state that the overall Transport Strategy will 'Improvement the health and wellbeing of local people, by encouraging physically active means of travel and providing access to adequate healthcare facilities'.
- CS7 (ii) could possibly be re-worded to clarify that developments should incorporate accessibility by private vehicles (in addition to parking provision), but that this is not a sustainable mode of travel.
- Although it is recognised that CS7 supports the implementation of the major projects within the Merseyside Local Transport Plan 3, reference to this document would strengthen these links and help to ensure that all elements of the LTP3 are implemented across Knowsley.
- Clarity could be provided in relation to the definition of ‘smaller scale proposals’ where Transport Assessments and/or Travel Plans will not be required.
- CS7 (ii) could be strengthened by:
  - Re-wording to emphasise that it should be the developer’s responsibility to ensure that their site is accessible by public transport, walking and cycling and to make the necessary improvements to local infrastructure to support this. (Links with the
Infrastructure Delivery Plan to be made here).

- Re-wording to ensure clarity over priority for sustainable modes of travel over the need of private vehicles.
- Adding a reference to the Ensuring Choice of Travel Supplementary Planning Document.
- Making reference to air quality within (4).

- That consideration is given to the use of or explanation of the term ‘Active Travel’ within the policy or supporting text, to align with terminology within the LTP3. However, the difficulty of using language which is not an adopted planning terms is recognised.
- In order to mitigate against any negative impacts of the proposed schemes within CS7 (iii), it is proposed that Knowsley Council ensure (through requiring developers of schemes within Knowsley or lobbying those leading on the development of schemes outside the Borough) that separate Health Impact Assessments are carried out on major proposals at an appropriate time.
- CS7 (iii) could also be strengthened by the addition of an extra bullet point which encourages development of multi-modal transport sites.
- Opportunities to promote community transport through CS7 should be explored, or at least, future expansion of community transport projects should not be inhibited by the proposed Preferred Option.
- CS7 could also include reference to the importance of maintenance of transport hubs in encouraging safety and use by all sectors of the community.

<table>
<thead>
<tr>
<th>CS8: Green Infrastructure</th>
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<tr>
<td>- That re-wording of Preferred Option CS8 is undertaken to ensure that the full range of opportunities for physical activity within the Borough’s Green Infrastructure is recognised, for example, through play and as a means of accessing employment and services.</td>
</tr>
<tr>
<td>- That other important factors and functions of the Green Infrastructure are recognised within the supporting text of CS8 including allowing people to interact with the natural environment to promote mental wellbeing.</td>
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<tr>
<td>- That other important factors and functions of Green Infrastructure are recognised within Preferred Option CS8 including it’s function as a buffer zone to reduce the impact of air and/or noise pollution.</td>
</tr>
<tr>
<td>- That opportunities for increased community involvement are explored, although this could be considered as part of the overarching policies of CS1 or CS2.</td>
</tr>
<tr>
<td>- That reference to areas for local food production is made either within the policy itself or within</td>
</tr>
</tbody>
</table>
- That reference to local food production (e.g. farms, small holdings and allotments) is added within CS8 (i) as appropriate. This will increase recognition of these issues and will also provide increased protection for allotment sites within CS21 (which refers to the protection of Green Infrastructure functions listed in CS8).

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<tr>
<th>CS9 – 14: Principal Regeneration Areas</th>
<th>Not assessed.</th>
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</table>
| CS15: Delivering Affordable Housing   | - That the supporting text for the Preferred Option be re-phrased to try to encourage over the minimum of 25% affordable housing for market schemes.  
- That the Preferred Option be open to encouraging new types of affordable housing products which may develop over time.  
- That it be made clear that new housing sites, including those potentially made available as part of the Green Belt review and release, incorporate the same levels of affordable housing as other residential sites within the Borough. |
| CS16: Specialist and Supported Accommodation | - That where possible, it is be specified that residents of specialist and supported living accommodation are included within the design of new buildings, therefore accounting for the needs and aspirations of older people, for example, scooter parking.  
- That opportunities for re-modelling and re-fitting older people’s accommodation are maximised through wording of the Preferred Option.  
- That the Preferred Option is amended to capitalise on opportunities to align planning policies with health policies, e.g. care at home. |
| CS17: Housing Sizes and Design Standards | - That the Preferred Option should emphasise that good quality design should be given a high priority, to mitigate against examples of poor design within the Borough.  
- That provision of new housing which includes bungalows should be supported where appropriate within the Borough, including both affordable and market units. |
| CS18: Accommodation for Gypsies and Travellers and Travelling | - The Preferred Option could be amended to highlight the opportunity presented by planning and health colleagues working together to tackle issues of social exclusion, and providing out reach and other services to the Gypsy and Traveller and Travelling Showpeople communities within the area.  
- Preferred Option CS18 could outline the opportunities presented by planning and health colleagues working together to tackle issues of social exclusion, and providing outreach and other services to the Gypsy and Traveller and Travelling Showpeople communities within the area. |
colleagues working together to address social exclusion issues and provide outreach and other services to the Gypsy and Traveller and Travelling Showpeople communities within the area where appropriate.

**CS19: Design Quality and Accessibility in New Development**
- That reference is made within CS19 (1) to the importance of responding to, complementing and integrating views and scenery, particularly of natural landscapes, possibly within the supporting text.
- That reference to ‘unacceptable impacts’ as stated in CS19 (7) is further explained within the Preferred Option itself or the supporting text.
- That potential conflicts between aesthetic design quality and environmentally friendly design are explored and tackled, potentially within the Design Quality in New Development Supplementary Planning Document.
- The importance of creating legible environments where people can orientate themselves easily both within development sites and internally within buildings could be mentioned, either within CS19 or in the Design Quality in New Development Supplementary Planning Document.
- In addition, internal building design should reflect health objectives, for example, by placing stairs in a more prominent position than the lifts, making optimum use of views and natural light.
- Appropriate signage could also be mentioned as a means of helping people orientate themselves more easily.
- That CS19 (8) is strengthened through reference to the principles of Secure By Design, the recognised standard for improving community safety through design. A reference to the need to create natural surveillance here or in (4) would also be welcomed.
- Reference to the need for landscaping which is appropriate for the area and given long term consideration would also reinforce the community safety priority.
- Specific reference could be made to the importance of highway design in creating streets which encourage social interaction and play e.g. Home zones and/or the Manual for Streets (or this may be more appropriate within CS19 or within a relevant Supplementary Planning Document).

**CS20: Managing Heritage**
- There is potential conflict between improving the energy efficiency of a historic building, whilst also preserving its character. However, often older buildings can be colder with higher levels of damp and draughts than modern housing. This can be detrimental to human health, particularly, the elderly and vulnerable. It is felt that CS20 should state the need to improve
the energy efficiency of historic buildings where this is appropriate, whilst accounting for conservation requirements. Further guidance about this could be given within the Design Quality in New Development Supplementary Planning Document

### CS21: Urban Greenspaces

- That linkages between Preferred Option CS21 and the Knowsley Rights of Way programme are made, possibly within the supporting text of CS21.
- That CS21 be amended to note that developer contributions should be used in the most appropriate way i.e. provision of new open space or contribution to the maintenance or improvement of established green space within the area.
- That CS19 (8) is strengthened through reference to the principles of Secure By Design, the recognised standard for improving community safety through design, or via reference within the supporting text to CS19.
- Further links could be made with the Greenspace Strategy and the need to increase community safety within open spaces within the Borough.

### CS22: Sustainable and Low Carbon Development

- That CS22 (i) make reference to the efficient re-use of materials and use of recycled materials within developments.
- That in addition to ‘local suppliers’, reference is also made to ‘local materials’ within (7). This will not only support local businesses but will also ensure that materials do not use large amount of carbon through the transportation process.
- That a reference to encouraging active travel (walking and cycling) through the design, layout and location of development by added to add strength to this issue.
- Consideration should be given to encouraging buildings undergoing refurbishment, including historic buildings, to apply standards such as BREEAM and the Code for Sustainable Homes, where appropriate.
- That opportunities to strengthen CS22 (iii) to encourage and facilitate more installation of decentralised energy networks is considered.
- Supporting text for CS22 could outline not only the environmental benefits of reduced energy consumption but also the social and health benefits in terms of reducing fuel poverty and financial exclusion (however, this may be more appropriate within the Design Quality in New Development or Sustainability in Design and Construction Supplementary Planning Document).

### CS23: Renewable and Low Carbon

- That work is undertaken with the Scientific Officer to agree an approach to the use of Biomass within new developments in the Borough.
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<th>Infrastructure</th>
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| CS24: Managing Flood Risk | - That the term ‘SFRA’ within Point 3 is explained.  
- In addition to mitigation measures to manage the risk of flooding, consideration should be given to the actual design of buildings on the site to reduce the impact of flooding on the buildings themselves and their inhabitants. However, it is recognised that this may be more appropriate within Preferred Option CS19, with additional guidance given with the Design Quality in New Development Supplementary Planning Document. |
| CS25: Management of Mineral Resources | - That CS25 (i) the requirement for ‘a proportion of construction aggregates…from recycled or secondary sources’ is strengthened to say ‘a significant proportion’ or something similar.  
- That major future mineral extraction work and/or major development within areas of existing or proposed mineral extraction (e.g. backfilling) be subject to separate Health Impact Assessments. |
| CS26: Waste Management | - That within CS26 (3), ‘re-use’ of materials is added to strengthen this point.  
- That within CS26 (5), the term ‘impacts’ are further explained, for example, would it be clearer to state ‘negative impacts’ or maybe explain what these impacts may be. |
| CS27: Planning for and Paying for New Infrastructure | - That the Infrastructure Delivery Plan (IDP), when developed in full, properly reflects the needs of local communities and ensures that developer contributions are allocated and spent in ways which will support improvements to social cohesion and capital. In addition, local communities should also be involved in the development of the IDP where appropriate, through public consultation and involvement in stakeholder groups. |

### ADDITIONAL COMMENTS BY TOPIC AREA

**Housing**  
- Where appropriate the Core Strategy should make mention of the importance of post-construction management of all types of housing, not just for Gypsy and Traveller and Travelling Showpeople accommodation. This will help to manage accidents within the home.  
- That the Core Strategy also makes greater links to the Knowsley Housing Strategy currently under development.  
- That strong links between new residential development and greenspaces/communal areas
should be made.

| Access to public services | • Re-wording Preferred Option CS6 to promote suitable night-time uses within Knowsley’s existing town centres, which will encourage social interaction and cultural activities.  
• That additional work is undertaken and local evidence gathered around the issues relating to hot food takeaways within the Borough, and the opportunities to tackle this problem through the planning process are explored, dependent upon the outcome of the local evidence. It is recognised that this may be better addressed within a subsequent Local Plan document to the Core Strategy alongside other mechanisms, e.g. licensing restrictions.  
• Links to the Borough wide Child Health Strategy could be made to highlight issues relating to access to public services for future generations.  
• Potential gaps in references to schooling and health centres within the wider document should be considered, including service provision and accessibility.  
• Greater flexibility about use of public buildings, for example schools, could be employed to ensure service delivery at a level accessible to communities. Opportunities should be taken to explore how to promote this through the Core Strategy, subsequent Local Plan documents and potentially other Council plans and strategies. |
| Opportunities for physical activity | • That reference is made within the Core Strategy to the Borough’s Leisure and Culture Strategy. |
| Air, noise and neighbourhood amenity | None |
| Accessibility and transport | None |
| Crime reduction and community safety | • That the Core Strategy or subsequent Local Plan document include measures to encourage the incorporation of sensitive lighting within the design of new development including housing, business and transport hubs, to reduce opportunities for crime and fear of crime. It is recognised that this may be most appropriate within a relevant Supplementary Planning Document.  
• That community involvement in the design of new facilities and community ownership/maintenance of open spaces and other areas be encouraged to help increase community safety, for example, through ‘Friends of’ groups. |
| Access to healthy food | • That investigation into limiting numbers of additional takeaway food outlets within certain areas of the Borough is continued, and that appropriate measures are incorporated within the Core Strategy or Supplementary Planning Documents to deal with this in future, alongside investigation of other potential restrictions e.g. licensing of premises. |
| Access to work | None |
| Social cohesion and social capital | • That increased community engagement is undertaken within all aspects of regeneration, investment and development. Opportunities for this include through the design of new buildings and service provision and through investment and long-term maintenance of parks and open spaces (‘Friends of’ groups, allotment groups etc). This should be encouraged throughout the Core Strategy as a whole.  
• Leisure and cultural facilities can also provide a focus for social interaction, and increased reference to these facilities could be made throughout the Core Strategy.  
• That further encouragement is given to new start up businesses and social enterprise, for example, within CS4; and also, voluntary and community groups such as ‘Friends of’ groups within CS8 and CS21. 
• That consideration is given to where there is a need for new community facilities and where consolidation and investment is required in other areas. It is recognised that this is an area which the Council may not have tackled on a borough wide basis yet and therefore would be difficult to convert into policy at this stage. |
| Resource minimisation | • That reference within the Core Strategy is made to prioritising the redevelopment of brown field land, not just land within existing urban areas. This may be most appropriate within CS1 or CS2 and could be reinforced within policy CS22 or CS26. |
| Climate change | None |
### APPENDIX B: RESPONSE TO INTERIM HEALTH IMPACT ASSESSMENT RECOMMENDATIONS AT PREFERRED OPTIONS STAGE (as published in “Accounting for Assessments” document, Knowsley Council, November 2012)

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<tr>
<th>Document Para Ref</th>
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<tbody>
<tr>
<td>Policy CS1</td>
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<tr>
<td>No Recommendations</td>
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<tr>
<td>Policy CS 2</td>
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<tr>
<td>App A CS2 a)</td>
<td>That Preferred Option CS2 is strengthened to ensure accessibility to public services for vulnerable groups is given appropriate consideration.</td>
<td>No</td>
<td>Noted. The Council considers it appropriate to promote access to public services for all; by definition this includes vulnerable groups. Therefore no additions have been made.</td>
</tr>
<tr>
<td>App A CS2 b)</td>
<td>It should be recognised that walking and cycling, although beneficial to human health, is not an appropriate means of transport for everyone and this could be emphasised within the supporting text of Preferred Option CS2.</td>
<td>No</td>
<td>Noted. It is felt that the wording of the third section of policy CS2 already accounts for this. The use of the word “particularly” emphasises that these options may not be suitable for everyone.</td>
</tr>
<tr>
<td>App A CS2 c)</td>
<td>Whilst the principle that new development will have ‘no negative impact upon flood risk, air quality, etc’ is commendable, and a positive in terms of human health, it is questionable how realistic this is and how it would be measured and implemented. It is therefore recommended that this be reworded to take account of these issues.</td>
<td>Yes</td>
<td>Policy CS2 has been amended to reflect this, as follows: “Minimising negative impact upon flood risk, air quality, water quality, land quality, soil quality, and noise or vibration levels and ensuring any negative impacts are appropriately mitigated”.</td>
</tr>
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<tr>
<td>App A CS2 d)</td>
<td>More specific guidance on noise levels should be included where appropriate (i.e. within the Core Strategy or Supplementary Planning Documents). Work to be undertaken with the Scientific Officer to make links to the Merseyside Noise Policy.</td>
<td>No</td>
<td>Noted. It is considered that specific references to noise policy are generally outside of the scope of the LDF, although could be suitable for incorporation in a future DPD.</td>
</tr>
<tr>
<td>App A CS2 e)</td>
<td>That reference to the North West Sustainability Checklist for Developments is changed to something more current (the North West Regional Assembly has now been disbanded), for example, a reference to the Sustainability in Design and Construction Supplementary Planning Guidance or national recognised standard such as the Code for Sustainable Homes or BREEAM.</td>
<td>Yes</td>
<td>Policy CS2 has been amended to future-proof the approach in relation to meeting minimum sustainability standards. This includes removing reference to specific guidance documents, and instead referring in general to minimum existing standards. Policy CS22 and CS23 expand on this, as indicated in the “policy links” section under policy CS2.</td>
</tr>
<tr>
<td>App A CS2 f)</td>
<td>That reference to the use of 'new technology' in order to reduce emissions is considered.</td>
<td>Yes</td>
<td>Noted. The role of new technology in minimising carbon emissions and helping to manage the impacts of climate change has been recognised in the policy wording of CS2.</td>
</tr>
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</table>

**Policy CS 3**

<p>| App A CS3 a)  | That a separate Health Impact Assessment be undertaken on all applications which fall outside the stated housing density parameters, where a residential scheme is for 15 | ?                     | ?                     |</p>
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<tbody>
<tr>
<td>App A CS3 b)</td>
<td>That planning and health colleagues work together to better understand the changing health and housing needs of the Borough, to allow planning for the future.</td>
<td>No</td>
<td>Noted. The preparation of the Core Strategy has involved extensive consultation with health colleagues from across the Council and the Primary Care Trust, and this should be continued with other LDF documents and similar projects.</td>
</tr>
<tr>
<td>App A Housing a)</td>
<td>Where appropriate the Core Strategy should make mention of the importance of post-construction management of all types of housing, not just for Gypsy and Traveller and Travelling Showpeople accommodation. This will help to manage accidents within the home.</td>
<td>Yes</td>
<td>Post-construction management has been mentioned as a policy requirement within CS19. However, this is only where appropriate, as post-construction management will not be relevant to all types of new development.</td>
</tr>
<tr>
<td>App A Housing b)</td>
<td>That the Core Strategy also makes greater links to the Knowsley Housing Strategy currently under development.</td>
<td>Yes</td>
<td>The Housing Strategy has been mentioned in the supporting text for policy CS3.</td>
</tr>
<tr>
<td>App A Housing c)</td>
<td>That strong links between new residential development and greenspaces/communal areas should be made.</td>
<td>No</td>
<td>The Council considers that this is already achieved through policy CS21.</td>
</tr>
</tbody>
</table>

**Policy CS 4**

| App A CS4 a) | Any significant development being classified as edge or out of centre is subject to a separate Health Impact Assessment process. It is recognised that a process will have to be undertaken to define ‘significant development’, | No | Health Impact Assessment is a requirement in CS2 (Development Principles). Policy CS4 relates to |


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<tr>
<td></td>
<td>to ensure that the required HIAs are not too onerous for the development and case officers involved.</td>
<td></td>
<td>employment land provision</td>
</tr>
<tr>
<td>App A CS4 b)</td>
<td>That CS4 be strengthened to recognise that the quality and connectivity of the retail environment is important to ensure that town centres are considered as a whole.</td>
<td>No</td>
<td>Not considered to be a strategic level issue</td>
</tr>
<tr>
<td>App A CS4 c)</td>
<td>That further Health Impact Assessment work is carried out on major developments on sites proposed for review and potential release from the Green Belt for employment or other uses.</td>
<td>No</td>
<td>This relates to the Core Strategy’s evidence base, not Policy CS4.</td>
</tr>
<tr>
<td>App A CS4 d)</td>
<td>That a reference be made to ‘an appropriate range of high quality jobs’ within CS4 (i) Point 3 to emphasise the need for high quality employment within the Borough</td>
<td>No</td>
<td>There is no evidence for the need for ‘high quality’ jobs.</td>
</tr>
<tr>
<td>App A CS4 e)</td>
<td>That within CS4 (iii), accessibility by sustainable modes of transport is made a factor within the proposed phasing of release of land for employment uses. In addition, that this section is expanded to include ensuring a supply of business start-up premises around the Borough.</td>
<td>No</td>
<td>Sustainability is a consideration for the location of sites not for the phasing of delivery if those sites</td>
</tr>
<tr>
<td>App A CS4 f)</td>
<td>That opportunities to provide additional services which employees may require such as childcare and health care are encouraged within employment areas such as industrial and businesses parks which are away from traditional town centres.</td>
<td>No</td>
<td>This is contrary to Policy CS4 (v) “Safeguarding of Existing Employment Land”</td>
</tr>
<tr>
<td>App A CS4 g)</td>
<td>That the need to promote new and emerging types of businesses e.g. the Knowledge Economy is encouraged, in order to diversify the range of jobs available within the area.</td>
<td>No</td>
<td>Policy CS4 (i) bullet 1 supports emerging employment sectors.</td>
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<td>App A CS4 h)</td>
<td>That opportunities to encourage working from home and improvements within digital communications and telecommunication should be explored (although possibly within the Infrastructure Delivery Plan, Design Quality in New Development or other Supplementary Planning Document, as appropriate).</td>
<td>Yes</td>
<td>A new bullet point “Encourage home working through improvements to digital communications and telecommunications infrastructure;” has been added to CS4(i) “Overall Employment Development Strategy”</td>
</tr>
<tr>
<td>App A CS4 i)</td>
<td>That reference to the Council’s emerging Economic Regeneration Strategy is mentioned where and if appropriate.</td>
<td>No</td>
<td>Economic Regeneration Strategy is mentioned as a delivery mechanism for Policy CS4</td>
</tr>
<tr>
<td>App A Social cohesion and social capital c)</td>
<td>That further encouragement is given to new start up businesses and social enterprise, for example, within CS4; and also, voluntary and community groups such as ‘Friends of’ groups within CS8 and CS21.</td>
<td>Yes</td>
<td>A new bullet point “Support new start up businesses including social enterprise” has been added to CS4(i) “Overall Employment Development Strategy”</td>
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<tr>
<td>Policy CS 5</td>
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<tr>
<td>App A CS5 a)</td>
<td>That the Preferred Option be amended to highlight that a separate Health Impact Assessment could be undertaken on schemes which involve major development proposals on any ‘Reserved’ or ‘Safeguarded’ Location within the Green Belt, and that the recommendations of the HIA are incorporated within any development.</td>
<td>No</td>
<td>CS5 is not considered the appropriate place to introduce a requirement for HIAs which may also apply to larger sites within the urban area.</td>
</tr>
<tr>
<td>App A CS5 b)</td>
<td>That new development within any ‘Reserved’ or ‘Safeguarded’ Locations should retain or encourage access to adjacent open/rural areas (e.g. footpaths) and preserve as many natural features of the original character of the</td>
<td>No</td>
<td>Noted. Detailed policies within the Local Plan: Site Allocations and Development Policies will identify the</td>
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<td>landscape as possible (e.g. tree-lines and hedgerows).</td>
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<td>issues developers should consider when making a planning application. Detailed guidance is also provided in the Ensuring a Choice of Travel SPD which will ensure adequate provision is made for working and cycling.</td>
</tr>
<tr>
<td>App A CS5 c)</td>
<td>To recognise that the Green Belt land is sometimes not perceived as an area which can be used for physical activity/recreation and therefore there are opportunities for colleagues within planning/regeneration and public health should work together to encourage more use of these areas and open space in general within Knowsley, also accounting for environmental considerations.</td>
<td>No</td>
<td>Noted.</td>
</tr>
<tr>
<td>Policy CS6</td>
<td>Investigate the potential of the Core Strategy to strengthen the strategic approach to the retention and / or enhancement of local service provision, particularly small shops (i.e. convenience goods).</td>
<td>No</td>
<td>The Council considers that the level of detail required in this regard is not suitable to be provided in a document such as the Core Strategy, which has a strategic focus. It is therefore the Council's intention to save policy S7 of the UDP following the adoption of the Core Strategy (that provides this information, as existing). This will ensure an appropriate transition period for development management.</td>
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<tr>
<td>App A CS6 b)</td>
<td>That where the Council owns vacant shops (largely within neighbourhood centres and not town centres), pro-active ways to encourage the development of new businesses and services are considered.</td>
<td>No</td>
<td>The Council considers that the level of detail required in this regard is not suitable to be provided in a document such as the Core Strategy, which has a strategic focus. It is therefore the Council’s intention to provide a more bespoke approach with regard to vacancy in local centres via a subsequent Site Allocations and Development Policies DPD.</td>
</tr>
<tr>
<td>App A CS6 c)</td>
<td>That opportunities to encourage the establishment of new local businesses and particularly social enterprise which encourage the provision of food within areas where access to fresh food and diet are particularly poor, are explored. However, it is recognised that this may only really be achievable where the Council owns the business premises and that this may be outside the remit of the planning process.</td>
<td>No</td>
<td>The Council considers that this issue falls outside of the scope of the Core Strategy as it is not a matter relating to strategic planning policy or that falls within the remit of existing planning controls.</td>
</tr>
<tr>
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<tr>
<td>App A CS6 d)</td>
<td>That the supporting text to CS6 references the need for provision of a suitable retail environment for affordable, fresh produce, particularly in some of the more deprived areas of the Borough.</td>
<td>No</td>
<td>The Council considers that the level of detail required in this regard is not suitable to be provided in a document such as the Core Strategy, which has a strategic focus. It is therefore the Council’s intention to consider a more bespoke approach with regard to the suitability and function of different retail uses via a subsequent Site Allocations and Development Policies DPD.</td>
</tr>
<tr>
<td>App A Access to public services a)</td>
<td>Re-wording Preferred Option CS6 to promote suitable night-time uses within Knowsley’s existing town centres, which will encourage social interaction and cultural activities.</td>
<td>Yes</td>
<td>The Council agrees that there is a need for consistency in identifying support for enhancements to the evening economy across multiple policies. Additional wording has been provided in policy CS6.</td>
</tr>
<tr>
<td>App A Access to public services b)</td>
<td>That additional work is undertaken and local evidence gathered around the issues relating to hot food takeaways within the Borough, and the opportunities to tackle this problem through the planning process are explored, dependent upon the outcome of the local evidence. It is recognised that this may be better addressed within a subsequent LDF document to the Core Strategy alongside other mechanisms, e.g. licensing restrictions.</td>
<td>No</td>
<td>The Council considers that the level of detail required in this regard is not suitable to be provided in a document such as the Core Strategy, which has a strategic focus. It is therefore the Council’s intention to consider a more</td>
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<tr>
<td>App A Access to healthy food a)</td>
<td>That investigation into limiting numbers of additional takeaway food outlets within certain areas of the Borough is continued, and that appropriate measures are incorporated within the Core Strategy or Supplementary Planning Documents to deal with this in future, alongside investigation of other potential restrictions e.g. licensing of premises.</td>
<td>No</td>
<td>The Council considers that the level of detail required in this regard is not suitable to be provided in a document such as the Core Strategy, which has a strategic focus. It is therefore the Council’s intention to consider a more bespoke approach with regard to the suitability and function of different retail uses via a subsequent Site Allocations and Development Policies DPD and / or an additional SPD (if required).</td>
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<td>Policy CS 7</td>
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<tr>
<td>App A CS7 a)</td>
<td>That CS7 (i) is re-worded to state that the overall Transport Strategy will ‘Improvement the health and wellbeing of local people, by encouraging physically active means of travel and providing access to adequate healthcare facilities’.</td>
<td>No</td>
<td>Improving health and wellbeing of local people is not limited to encouraging physically active means of travel and providing access to adequate</td>
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<tr>
<td>App A CS7 b)</td>
<td>CS7 (ii) could possibly be re-worded to clarify that developments should incorporate accessibility by private vehicles (in addition to parking provision), but that this is not a sustainable mode of travel.</td>
<td>No</td>
<td>Bullet point 1 states that new development will be required to be located and designed to prioritise accessibility and sustainable modes of travel through a choice of walking, cycling, and public transport. Supplementary Planning Document will provide further details.</td>
</tr>
<tr>
<td>App A CS7 c)</td>
<td>Although it is recognised that CS7 supports the implementation of the major projects within the Merseyside Local Transport Plan 3, reference to this document would strengthen these links and help to ensure that all elements of the LTP3 are implemented across Knowsley.</td>
<td>Yes</td>
<td>Text amended to include support for Local Transport Plan priorities.</td>
</tr>
<tr>
<td>App A CS7 d)</td>
<td>Clarity could be provided in relation to the definition of 'smaller scale proposals' where Transport Assessments and/or Travel Plans will not be required.</td>
<td>Yes</td>
<td>“Further guidance on these issues will be provided in a revised Ensuring a Choice of Travel Supplementary Planning Document.” will be added to Policy CS7.</td>
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<tr>
<td>App A CS7 e)</td>
<td>CS7 (ii) could be strengthened by;</td>
<td>Yes</td>
<td>“Further guidance on these issues will be provided in a revised Ensuring a Choice of Travel Supplementary Planning Document.” will be added to Policy CS7. Improving air quality will be added after bullet point 4.</td>
</tr>
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</table>
|                   | - Re-wording to emphasise that it should be the developer’s responsibility to ensure that their site is accessible by public transport, walking and cycling and to make the necessary improvements to local infrastructure to support this. (Links with the Infrastructure Delivery Plan to be made here).  
- Re-wording to ensure clarity over priority for sustainable modes of travel over the need of private vehicles.  
- Adding a reference to the Ensuring Choice of Travel Supplementary Planning Document.  
- Making reference to air quality within (4). |                      |                      |
<p>| App A CS7 f)      | That consideration is given to the use of/or explanation of the term ‘Active Travel’ within the policy or supporting text, to align with terminology within the LTP3. However, the difficulty of using language which is not an adopted planning terms is recognised. | No                    | People understand “cycling” and “walking”. Calling it “Active Travel” may confuse. |
| App A CS7 g)      | In order to mitigate against any negative impacts of the proposed schemes within CS7 (iii), it is proposed that Knowsley Council ensure (through requiring developers of schemes within Knowsley or lobbying those leading on the development of schemes outside the Borough) that separate Health Impact Assessments are carried out on major proposals at an appropriate time. | No                    | Requirement for Health Impact Assessments will be contained with the Site Allocations and Development Policies Development Plan Document. |
| App A CS7 h)      | CS7 (iii) could also be strengthened by the addition of an extra bullet point which encourages development of multi-modal transport sites. | No                    | CS7 (iii) already contains priority to schemes which would include provision of Park and Ride facilities and expansion and/or improvement of the Knowsley Rail Freight Terminal. |
| App A CS7 i)      | Opportunities to promote community transport through CS7 | No                    | CS 7 (i) already contains                      |</p>
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<td>should be explored, or at least, future expansion of community transport projects should not be inhibited by the proposed Preferred Option.</td>
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<td>support for a sustainable and integrated transport system that will ensure that people can get to where they need to go by a choice of walking cycling, and public transport. The Council’s desire to work with the community transport sector has been added to supporting text.</td>
</tr>
<tr>
<td>App A CS7 j)</td>
<td>CS7 could also include reference to the importance of maintenance of transport hubs in encouraging safety and use by all sectors of the community.</td>
<td>No</td>
<td>This is not considered to be a strategic issue.</td>
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<tr>
<td><strong>Policy CS 8</strong></td>
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<td>App A CS8 a)</td>
<td>That re-wording of Preferred Option CS8 is undertaken to ensure that the full range of opportunities for physical activity within the Borough’s Green Infrastructure is recognised, for example, through play and as a means of accessing employment and services.</td>
<td>Yes</td>
<td>The Council agrees that reference to ‘access to employment and services’ will enhance the policy; changes have been made accordingly to policy CS8. However it is considered that ‘play’ would fall within the wider definition of ‘recreation’ meaning a specific reference in this regard is unnecessary.</td>
</tr>
<tr>
<td>App A CS8 b)</td>
<td>That other important factors and functions of the Green Infrastructure are recognised within the supporting text of CS8 including allowing people to interact with the natural environment to promote mental wellbeing.</td>
<td>Yes</td>
<td>The Council agrees that additional clarification in this regard will enhance the policy; changes have been made to policy CS8.</td>
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<tr>
<td>App A CS8 c)</td>
<td>That other important factors and functions of Green Infrastructure are recognised within Preferred Option CS8 including its function as a buffer zone to reduce the impact of air and/or noise pollution.</td>
<td>Yes</td>
<td>The Council agrees that additional clarification in this regard will enhance the policy; changes have been made to policy CS8.</td>
</tr>
<tr>
<td>App A CS8 d)</td>
<td>That opportunities for increased community involvement are explored, although this could be considered as part of the overarching Preferred Options of CS1 or CS2.</td>
<td>No</td>
<td>The Council agrees that additional clarification in this regard, however the inclusion of such a requirement is better located within an overarching policy or the design policy CS19.</td>
</tr>
<tr>
<td>App A CS8 e)</td>
<td>That reference to areas for local food production is made either within the policy itself or within the supporting text.</td>
<td>Yes</td>
<td>The Council agrees that additional clarification in this regard will enhance the policy; changes have therefore been made to policy CS8 to better align the policy with CS21.</td>
</tr>
<tr>
<td>App A CS8 f)</td>
<td>That reference to local food production (e.g. farms, small holdings and allotments) is added within CS8 (i) as appropriate. This will increase recognition of these issues and will also provide increased protection for allotment sites within CS21 (which refers to the protection of Green Infrastructure functions listed in CS8).</td>
<td>Yes</td>
<td>The Council agrees that some additional clarification in this regard will enhance the policy; changes have been made to policy CS8 to refer to allotments and better align the policy CS21.</td>
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<td>Policy CS 9</td>
<td>N/A</td>
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<td>Policy omitted at scoping stage of study</td>
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<td>Policy CS 10</td>
<td>N/A</td>
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<td>Policy omitted at scoping stage of study</td>
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<td>Policy CS 11</td>
<td>N/A</td>
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<td>Policy omitted at scoping stage of study</td>
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<td>Policy CS 12</td>
<td>N/A</td>
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<td>Policy omitted at scoping stage of study</td>
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<td>Policy CS 13</td>
<td>N/A</td>
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<td>Policy omitted at scoping stage of study</td>
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<td>Policy CS 14</td>
<td>N/A</td>
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<td>Policy omitted at scoping stage of study</td>
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<tr>
<td>Policy CS 15</td>
<td>App A CS15 a)</td>
<td>No</td>
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<td>That the supporting text for the Preferred Option be re-phrased to try to encourage over the minimum of 25% affordable housing for market schemes.</td>
<td>Policy CS15 already states that a minimum of 25% affordable housing will be sought. It is anticipated however that only Registered Provider-led developments (i.e. of 100% affordable housing) will voluntarily exceed this. The affordable housing requirement within CS15 has to be set to account for variations based</td>
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<td>on economic viability. The Council’s approach responds to evidence of housing need and demand and economic viability and is the most appropriate given this available evidence.</td>
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<tr>
<td>App A CS15 b)</td>
<td>That the Preferred Option be open to encouraging new types of affordable housing products which may develop over time.</td>
<td>Yes</td>
<td>The supporting text for CS15 has been altered to reflect the need for this flexibility.</td>
</tr>
<tr>
<td>App A CS15 c)</td>
<td>That it be made clear that new housing sites, including those potentially made available as part of the Green Belt review and release, incorporate the same levels of affordable housing as other residential sites within the Borough.</td>
<td>No</td>
<td>The Council considers that this policy approach is already sufficiently clear within the wording of policy CS15.</td>
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<td>CS 16</td>
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<tr>
<td>App A CS16 a)</td>
<td>That where possible, it is be specified that residents of specialist and supported living accommodation are included within the design of new buildings, therefore accounting for the needs and aspirations of older people, for example, scooter parking.</td>
<td>Yes</td>
<td>An extra criterion has been added to policy CS16 to reflect that, where appropriate, developers should seek to consult older people’s groups and/or relevant design guides as part of the development process.</td>
</tr>
<tr>
<td>App A CS16 b)</td>
<td>That opportunities for re-modelling and re-fitting older people’s accommodation are maximised through wording of the Preferred Option.</td>
<td>No</td>
<td>Policy CS16 already reflects opportunities for improving quality and remodelling existing accommodation.</td>
</tr>
<tr>
<td>App A CS16 c)</td>
<td>That the Preferred Option is amended to capitalise on opportunities to align planning policies with health policies,</td>
<td>Yes</td>
<td>The supporting text for policy CS16 has been amended to</td>
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<td>e.g. care at home.</td>
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<td>reflect this.</td>
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<td><strong>Policy CS 17</strong></td>
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<tr>
<td>App CS17 a)</td>
<td>That the Preferred Option should emphasise that good quality design should be given a high priority, to mitigate against examples of poor design within the Borough.</td>
<td>No</td>
<td>This is already reflected in numerous policies, including CS17 and CS19.</td>
</tr>
<tr>
<td>App A CS17 b)</td>
<td>That provision of new housing which includes bungalows should be supported where appropriate within the Borough, including both affordable and market units.</td>
<td>Yes</td>
<td>The need for provision of bungalows is emphasised in the Council's evidence base. The supporting text for policy CS17 has been changed to place emphasis on this.</td>
</tr>
<tr>
<td><strong>Policy CS 18</strong></td>
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<tr>
<td>App CS18 a)</td>
<td>The Preferred Option could be amended to highlight the opportunity presented by planning and health colleagues working together to tackle issues of social exclusion, and providing outreach and other services to the Gypsy and Traveller and Travelling Showpeople communities within the area.</td>
<td>Yes</td>
<td>The supporting text for CS18 has been amended to reflect this.</td>
</tr>
<tr>
<td><strong>Policy CS 19</strong></td>
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<tr>
<td>App A CS19 a)</td>
<td>That reference is made within CS19 (1) to the importance of responding to, complementing and integrating views and scenery, particularly of natural landscapes, possibly within the supporting text.</td>
<td>Yes</td>
<td>The Council agrees that additional clarification in the supporting text in this regard with supplement specific references to related considerations in sub-point 1 of the policy. Additional wording has been provided accordingly.</td>
</tr>
<tr>
<td>App A CS19</td>
<td>That reference to ‘unacceptable impacts’ as stated in CS19</td>
<td>No</td>
<td>The Council considers that</td>
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<tr>
<td>b)</td>
<td>(7) is further explained within the Preferred Option itself or the supporting text.</td>
<td></td>
<td>appropriate clarity has already been provided in this regard within the supporting text, that provides a strategic link to more specific detail within saved policies in the UDP: ENV1, ENV2 and ENV3 (until they are subsequently superseded by a Site Allocations and Development Policies DPD), and the existing Householder Development SPD.</td>
</tr>
<tr>
<td>App A CS19 c)</td>
<td>That potential conflicts between aesthetic design quality and environmentally friendly design are explored and tackled, potentially within the Design Quality in New Development Supplementary Planning Document.</td>
<td>No</td>
<td>The Council agrees that there is a need to find appropriate balance in design between aesthetic quality and environmental sustainability. However the level of specific detail required in this context is not of a strategic nature that can be included within a Core Strategy. It is therefore appropriate to provide additional and more detailed guidance with the emerging Design Quality in New Development SPD.</td>
</tr>
<tr>
<td>App A CS19</td>
<td>The importance of creating legible environments where</td>
<td>No</td>
<td>The Council agrees that there</td>
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<td>d)</td>
<td>people can orientate themselves easily both within development sites and internally within buildings could be mentioned, either within CS19 or in the Design Quality in New Development Supplementary Planning Document.</td>
<td></td>
<td>is a need to provide detailed guidance on issues such as legibility as a component of design quality. However the level of specific detail required in this context is not of a strategic nature that can be included within a Core Strategy. It is therefore appropriate to provide additional and more detailed guidance with the emerging Design Quality in New Development SPD.</td>
</tr>
<tr>
<td>App A CS19 e)</td>
<td>In addition, internal building design should reflect health objectives, for example, by placing stairs in a more prominent position than the lifts, making optimum use of views and natural light.</td>
<td>No</td>
<td>The Council agrees that there is a need to provide detailed guidance on issues such as internal design as a component of design quality. However the level of specific detail required in this context is not of a strategic nature that can be included within a Core Strategy. It is therefore appropriate to provide additional and more detailed guidance with either the emerging Design Quality in New Development SPD or the Sustainability of New Development SPD.</td>
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<tr>
<td>App A CS19 f)</td>
<td>Appropriate signage could also be mentioned as a means of helping people orientate themselves more easily.</td>
<td>Yes</td>
<td>The Council agrees that the policy is enhanced through reference to ‘appropriate signage’ and additional wording in this regard has been provided accordingly. Development SPD.</td>
</tr>
<tr>
<td>App A CS19 g)</td>
<td>That CS19 (8) is strengthened through reference to the principles of Secure By Design, the recognised standard for improving community safety through design. A reference to the need to create natural surveillance here or in (4) would also be welcomed.</td>
<td>Yes</td>
<td>The Council agrees that the policy is enhanced through reference to ‘natural surveillance’ and additional wording in this regard has been provided accordingly. However it is considered that the approach of referencing the principles of Secured by Design within the supporting text rather than within the policy is appropriate given the need for flexibility to adapt to future initiatives that may emerge during the plan period.</td>
</tr>
<tr>
<td>App A CS19 h)</td>
<td>Reference to the need for landscaping which is appropriate for the area and given long term consideration would also reinforce the community safety priority.</td>
<td>Yes</td>
<td>The Council agrees that clarification of the expectation that associated landscaping is delivered will enhance the policy approach. Additional wording has been provided</td>
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<tr>
<td>App A CS19 i)</td>
<td>Specific reference could be made to the importance of highway design in creating streets which encourage social interaction and play e.g. Home zones and/or the Manual for Streets (or this may be more appropriate within CS19 or within a relevant Supplementary Planning Document).</td>
<td>No</td>
<td>The Council agrees that there is a need to provide detailed guidance on issues such as highway design and encouraging social interaction. However the level of specific detail required in this context is not of a strategic nature that can be included within a Core Strategy. It is therefore appropriate to provide additional and more detailed guidance with either the emerging Design Quality in New Development SPD.</td>
</tr>
<tr>
<td>App A Crime reduction and community safety a)</td>
<td>That the Core Strategy or subsequent LDF document include measures to encourage the incorporation of sensitive lighting within the design of new development including housing, business and transport hubs, to reduce opportunities for crime and fear of crime. It is recognised that this may be most appropriate within a relevant Supplementary Planning Document.</td>
<td>No</td>
<td>The Council considers that appropriate clarity with regard to ‘unacceptable impacts’ has already been provided in this regard within the supporting text, and provides a strategic link to more specific detail within a saved policy in the UDP: ENV3 (until subsequently superseded by a Site Allocations and Development Policies DPD).</td>
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<tr>
<td>App A Crime reduction and community safety b)</td>
<td>That community involvement in the design of new facilities and community ownership/maintenance of open spaces and other areas be encouraged to help increase community safety, for example, through ‘Friends of’ groups.</td>
<td>Yes</td>
<td>The Council agrees that clarification of the expectation of community engagement in the design process will enhance the policy approach. Additional wording has been provided accordingly.</td>
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**Policy CS 20**

| App A CS20 a) | There is potential conflict between improving the energy efficiency of a historic building, whilst also preserving its character. However, often older buildings can be colder with higher levels of damp and draughts than modern housing. This can be detrimental to human health, particularly, the elderly and vulnerable. It is felt that CS20 should state the need to improve the energy efficiency of historic buildings where this is appropriate, whilst accounting for conservation requirements. Further guidance about this could be given within the Design Quality in New Development Supplementary Planning Document | Yes | The Council agrees that the policy is enhanced through reference to ‘energy efficiency’ and additional wording in this regard has been provided accordingly. |

**Policy CS 21**

<p>| App A CS21 a) | That linkages between Preferred Option CS21 and the Knowsley Rights of Way programme are made, possibly within the supporting text of CS21. | Yes | The Council agrees that the supporting text would benefit from reference to ‘rights of way’. Additional wording has therefore been provided accordingly. |
| App A CS21 | That CS21 be amended to note that developer | No | The Council supports its |</p>
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<td>b)</td>
<td>contributions should be used in the most appropriate way i.e. provision of new open space or contribution to the maintenance or improvement of established green space within the area.</td>
<td></td>
<td>approach in view of the reference to the 'Greenspace Standards and New Development SPD' which provides detailed criteria in terms of developer contributions.</td>
</tr>
<tr>
<td>App A CS21 c)</td>
<td>That CS19 (8) is strengthened through reference to the principles of Secure By Design, the recognised standard for improving community safety through design, or via reference within the supporting text to CS19.</td>
<td>No</td>
<td>The Council considers that the approach of referencing the principles of Secured by Design within the supporting text of CS19 rather than within a policy is appropriate given the need for flexibility to adapt to future initiatives that may emerge during the plan period.</td>
</tr>
<tr>
<td>App A CS21 d)</td>
<td>Further links could be made with the Greenspace Strategy and the need to increase community safety within open spaces within the Borough.</td>
<td>No</td>
<td>The Council supports its approach of making specific reference to Knowsley’s Green Space Strategy within CS8, with reference to the linkage within the supporting text of this policy. Furthermore the issue of community safety is already addressed within the policy as part of accessibility and also remains part of quality.</td>
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<tr>
<td>App Social cohesion and social capital b)</td>
<td>Leisure and cultural facilities can also provide a focus for social interaction, and increased reference to these facilities could be made through out the Core Strategy.</td>
<td>No</td>
<td>The Council supports its approach in referring to leisure and culture within the hierarchy of centres and retail strategy (CS6) given both are classified as main town centre uses.</td>
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</tbody>
</table>

**Policy CS 22**

<table>
<thead>
<tr>
<th>App A CS22</th>
<th>That CS22 (i) make reference to the efficient re-use of materials and use of recycled materials within developments.</th>
<th>No</th>
<th>The efficient use of materials is already addressed by part 1 (d).</th>
</tr>
</thead>
<tbody>
<tr>
<td>App A CS22 b)</td>
<td>That in addition to ‘local suppliers’, reference is also made to ‘local materials’ within (7). This will not only support local businesses but will also ensure that materials do not use large amount of carbon through the transportation process</td>
<td>No</td>
<td>It is the intension of part (d) of CS22 to ensure that resources are used in the most effective and sustainable way. To require developments to use “local materials” would be overly onerous and restrictive.</td>
</tr>
<tr>
<td>App A CS22 c)</td>
<td>That a reference to encouraging active travel (walking and cycling) through the design, layout and location of development by added to add strength to this issue.</td>
<td>No</td>
<td>Sustainable transport is addressed by CS 19 Design Quality and Accessibility in New Development.</td>
</tr>
<tr>
<td>App A CS22 d)</td>
<td>Consideration should be given to encouraging buildings undergoing refurbishment, including historic buildings, to apply standards such as BREEAM and the Code for Sustainable Homes, where appropriate.</td>
<td>No</td>
<td>There is currently no evidence base to support this type of requirement. There may be opportunities to introduce localised and/or building specific targets for the refurbishment of buildings</td>
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<td>where the opportunity and need is apparent and can be evidenced.</td>
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<tr>
<td>App A CS22 e)</td>
<td>That opportunities to strengthen CS22 (iii) to encourage and facilitate more installation of decentralised energy networks is considered.</td>
<td>No</td>
<td>Noted and welcomed. This is the aim of part 7 – 9 of CS22.</td>
</tr>
<tr>
<td>App A CS22 f)</td>
<td>Supporting text for CS22 could outline not only the environmental benefits of reduced energy consumption but also the social and health benefits in terms of reducing fuel poverty and financial exclusion (however, this may be more appropriate within the Design Quality in New Development or Sustainability in Design and Construction Supplementary Planning Document).</td>
<td>No</td>
<td>Noted and welcomed. These matters have been explored and are documented in the Local Plan evidence base.</td>
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<tr>
<td><strong>Policy CS 23</strong></td>
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<tr>
<td>App A CS23 a)</td>
<td>That work is undertaken with the Scientific Officer to agree an approach to the use of Biomass within new developments in the Borough.</td>
<td>No</td>
<td>This will be addressed when more detailed guidance within the Sustainability in Design and Construction SPD is prepared.</td>
</tr>
<tr>
<td><strong>Policy CS 24</strong></td>
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<tr>
<td>App A CS24 a)</td>
<td>That the term ‘SFRA’ within Point 3 is explained.</td>
<td>Yes</td>
<td>Strategic Flood Risk Assessment will be written in full.</td>
</tr>
<tr>
<td>App A CS24 b)</td>
<td>In addition to mitigation measures to manage the risk of flooding, consideration should be given to the actual design of buildings on the site to reduce the impact of flooding on the buildings themselves and their inhabitants. However, it is recognised that this may be more appropriate within Preferred Option CS19, with additional guidance given with the Design Quality in New Development Supplementary Planning Document.</td>
<td>Yes</td>
<td>Design of buildings on the site to reduce the impact of flooding on the buildings will be introduced into CS19.</td>
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<td><strong>Policy CS 25</strong></td>
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<tr>
<td>App A CS25 a)</td>
<td>That CS25 (i) the requirement for 'a proportion of construction aggregates…from recycled or secondary sources' is strengthened to say 'a significant proportion' or something similar.</td>
<td>No</td>
<td>The current wording of the policy carries enough weight to ensure development uses appropriate amounts of recycled and secondary aggregated. The Council's emerging Sustainability in Design and Construction SPD will add further detail and guidance on this issue.</td>
</tr>
<tr>
<td>App A CS25 b)</td>
<td>That major future mineral extraction work and/or major development within areas of existing or proposed mineral extraction (e.g. backfilling) be subject to separate Health Impact Assessments.</td>
<td></td>
<td>The existing policy working provides a satisfactory level of higher level guidance to support the planning application process. Further detailed guidance and as requirement for development specific HIAs, if deemed appropriate, will be delivered by the Local Plan: Site Allocations and Development Policies.</td>
</tr>
<tr>
<td><strong>Policy CS 26</strong></td>
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<tr>
<td>App A CS26 a)</td>
<td>That within CS26 (3),'re-use' of materials is added to strengthen this point.</td>
<td>Yes</td>
<td>Policy CS26 has been amended to reflect this.</td>
</tr>
<tr>
<td>App A CS26 b)</td>
<td>That within CS26 (5), the term 'impacts' are further explained, for example, would it be clearer to state 'negative impacts' or maybe explain what these impacts</td>
<td>Yes</td>
<td>Policy CS26 has been amended to state that negative impacts only should</td>
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<td>Policy CS 27</td>
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<tr>
<td>App A CS27 a)</td>
<td>That the Infrastructure Delivery Plan (IDP), when developed in full, properly reflects the needs of local communities and ensures that developer contributions are allocated and spent in ways which will support improvements to social cohesion and capital. In addition, local communities should also be involved in the development of the IDP where appropriate, through public consultation and involvement in stakeholder groups.</td>
<td>No</td>
<td>The Council’s approach to preparation of the IDP, and subsequent documents (e.g. CIL charging schedule) will reflect priorities in the Core Strategy, including meeting community needs and providing appropriate social, physical and environmental infrastructure. Local communities will continue to be involved in the IDP through its role as a supporting document for the Core Strategy, and will also be involved in the development of the Council’s approach to future planning obligations.</td>
</tr>
<tr>
<td>App A Access to public services c)</td>
<td>Links to the Borough wide Child Health Strategy could be made to highlight issues relating to access to public services for future generations.</td>
<td>Yes</td>
<td>Noted. This has been referenced in the development of the IDP.</td>
</tr>
<tr>
<td>App A Access to public services d)</td>
<td>Potential gaps in references to schooling and health centres within the wider document should be considered, including service provision and accessibility.</td>
<td>No</td>
<td>This is considered within the scope of policy CS27 and the supporting IDP.</td>
</tr>
<tr>
<td>App A Access to</td>
<td>Greater flexibility about use of public buildings, for example schools, could be employed to ensure service delivery at a</td>
<td>No</td>
<td>The detail of how public buildings are used is outside</td>
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may be.
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<td>public services e)</td>
<td>level accessible to communities. Opportunities should be taken to explore how to promote this through the Core Strategy, subsequent LDF documents and potentially other Council plans and strategies.</td>
<td></td>
<td>of the scope of the Core Strategy. However the Council already operates such strategies through the Future Schooling programme. This issue is mentioned in the IDP.</td>
</tr>
<tr>
<td>App A Opportunities for physical activity a)</td>
<td>That reference is made within the Core Strategy to the Borough’s Leisure and Culture Strategy.</td>
<td>No</td>
<td>This is already mentioned within the IDP.</td>
</tr>
<tr>
<td>App A Social cohesion and social capital d)</td>
<td>That consideration is given to where there is a need for new community facilities and where consolidation and investment is required in other areas. It is recognised that this is an area which the Council may not have tackled on a borough wide basis yet and therefore would be difficult to convert into policy at this stage.</td>
<td>No</td>
<td>This is considered as part of the IDP and the assembly of evidence to support the implementation of future planning obligations within Knowsley.</td>
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