

13 June 2014

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

Our Ref: D131407

Dear Sir / Madam,

## HRA of Changes to the Knowsley Local Plan Core Strategy following Examination in Public

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

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

The most significant proposed modification from an HRA point of view is the inclusion of Chapter 6 and the nine proposed Sustainable Urban Extensions (SUEs). They are analysed in Table 2. The HRA undertaken for the submitted Local Plan Core Strategy already looked at strategic issues that were related purely to the total quantum of development in the borough. The overall quantum of development set out in the Local Plan has not increased and therefore these strategic borough-wide matters do not need re-investigation. The purpose of Table 2 is to determine whether there are any site-specific conflicts with European sites raised by the allocation of the nine Sustainable Urban Extensions (and the safeguarding of a further site at Knowsley Village). The analysis considers a) proximity to internationally important wildlife sites, b) suitability/likelihood of the allocated sites to support SPA bird species as a key feeding area or important high-tide roost, and c) potential impacts on flightlines to major roosts/other European sites.

URS Infrastructure & Environment UK Limited Scott House, Alençon Link Basingstoke, Hampshire RG21 7PP United Kingdom Tel: +44 (0)1256 310 200 Fax: +44 (0)1256 310 201 www.ursglobal.com In summary, it is concluded that there would be no introduction or exacerbation of likely significant effects on European sites as a result of these modifications.

Yours sincerely for URS Infrastructure & Environment UK Limited

James Rily

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Table 1. HRA analysis of Main Modifications to policies	Table 1. HRA analy	sis of Main Mo	odifications to	policies
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Modification number	Modification	Likely Significant Effect (LSE)?
M042	Provision of appropriate cross reference in Policy CS1 to the SUEs and their exclusion from the Green Belt	The SUEs are discussed in Table 2 below. This amendment merely includes cross-reference to those policies and therefore no LSE arises.
M043	Policy CS1 – inclusion of text 'Regeneration will be promoted outside the Principal Regeneration Areas where this is of a scale and nature which meets the needs and opportunities in the local area'.	Minor rewording of policy text to clarify intent and therefore no LSE arises.
M048	Policy CS2 - Clarification that the development principles apply to both development proposals and plan preparation.	Minor rewording of policy text to clarify intent and therefore no LSE arises.
M049	Policy CS2 – Amended to ensure that the key priorities of meeting housing, employment and retail needs are reflected in policy CS2.	Minor rewording of policy text to clarify intent and therefore no LSE arises.
M050	Policy CS2 – Adding reference to addressing any issues of unstable land, resulting from Knowsley's legacy of minerals extraction.	No. Does not present any potential pathway of impact on European sites.
M053	Policy CS3 - clarify that the policy aims to provide sufficient housing to meet needs and wider housing growth requirements over the plan period.	No. Does not present any potential pathway of impact on European sites.
M054	Policy CS3 – minor amendments to percentage of housing to be delivered in each settlement	No. The impact assessment in the submission HRA was based primarily on overall quantum of development in the borough and this has not changed in the proposed modifications.
M055	Policy CS3 – insertion of reference to the SUEs	The SUEs are discussed in Table 2 below. This amendment merely includes cross-reference to those policies and therefore no LSE arises.
M062	Policy CS4 - To provide clarification of the importance of meeting the development needs of the Liverpool City Region key economic sectors.	Minor rewording of policy text to clarify intent and therefore no LSE arises.
M063	Policy CS4 – Reduction in the minimum hectarage of land for employment development	No – a reduction in the hectarage would not exacerbate any likely significant effects or introduce any new effects
M064	Policy CS4 – insertion of reference to the SUEs	The SUEs are discussed in Table 2 below. This amendment merely includes cross-reference to those policies and therefore no LSE arises.
M065	Footnote to Policy CS4 – Amended to reduce the five-year supply from 51 ha to 45.5 ha	No – a reduction in the hectarage would not exacerbate any likely significant effects or introduce any new effects
M066	Policy CS4 - Removal of phasing requirement as it is no longer required following the allocation of former Green Belt locations via Policy SUE1.	The SUEs are discussed in Table 2 below. This amendment merely includes cross-reference to those policies and therefore no LSE arises.
M067	Policy CS4 – insertion of 'For edge of centre and out of centre proposals, preference will be given to accessible sites that are well connected to the town centre'.	Minor rewording of policy text to clarify intent and therefore no LSE arises.
M076	Policy CS5 – insertion of text 'Inappropriate development will not be permitted	Minor rewording of policy text to clarify intent and therefore

Modification number	Modification	Likely Significant Effect (LSE)?
	in the Green Belt except in very special circumstances in which it has been demonstrated that the harm to the Green Belt (including any harm to its openness, purposes or to its visual and recreational amenities) would be clearly outweighed by other considerations'.	no LSE arises.
M077	Policy CS5 - To remove the reference to reserve locations to ensure consistency with the approach to allocation of Sustainable Urban Extensions	The SUEs are discussed in Table 2 below. This amendment merely includes cross-reference to those policies and therefore no LSE arises.
M078	Policy CS5 – insertion of references to the SUEs	The SUEs are discussed in Table 2 below. This amendment merely includes cross-reference to those policies and therefore no LSE arises.
M079 – M081	Policy CS5 – deletion of text as development principles are now provided in SUE policies	The SUEs are discussed in Table 2 below. This amendment merely includes cross-reference to those policies and therefore no LSE arises.
M084	New paragraph 5.41A - Previously Developed Sites within the Green Belt The Council wishes to allow appropriate future development within previously developed sites in the Green Belt provided the openness of the Green Belt is preserved. Such sites vary widely in type and size and smaller sites will not be identified specifically on the Policies Map. However a number of previously developed sites in Knowsley's Green Belt including Kings Business Park and several sites used for operational needs by utility companies are of a major scale. The Council intends to identify these major sites in the Local Plan: Site Allocations and Development Policies, which may also include detailed policy guidance regarding new development within them.	This is not classed as a 'main' modification but has been included in this table as it refers to the potential for an unspecified number of sites at previously developed locations in the greenbelt to come forward. These sites will not change the overall quantum of development (housing and employment) across Knowsley that was assessed strategically in the submission Core Strategy. Therefore this text does not present any new likely significant effects. Individual sites could potentially involve site-specific effects depending on their location but this will be assessed when the sites are allocated as part of the Site Allocations document.
M112	Policy CS7 - To clarify that the Council is adequately considering flexibility for circumstances where all requirements for development may not be applicable, achievable or viable to implement.	Minor rewording of policy text to clarify intent and therefore no LSE arises.
M113	Policy CS7 – deletion of reference to Merseytram network	No – deletion of the Merseytram would not present any mechanism for LSE
M117	Policy CS8 – inclusion of reference to protecting designated sites	Minor rewording of policy text to clarify intent and therefore no LSE arises.
M119	Policy CS8 – minor wording changes e.g. replacement of 'where appropriate' with 'at a landscape scale'	Minor rewording of policy text to clarify intent and therefore no LSE arises.
M120	Policy CS8 – minor wording changes to ensure consistency with the Council's	Minor rewording of policy text to clarify intent and therefore

Modification number	Modification	Likely Significant Effect (LSE)?
	intention to replace the Greenspace Standards and New Development SPD with a Developer Contributions SPD.	no LSE arises.
M122	Policy CS8 – minor changes to enable adequate flexibility for consideration of circumstances where appropriate justification of limited opportunities for ecological enhancement could be provided	Minor rewording of policy text to clarify intent and therefore no LSE arises.
M123	Policy CS8 - Provide adequate mitigation and / or, as a last resort, compensation for Green Infrastructure or biodiversity loss, in circumstances where harm resulting from the development is otherwise unavoidable.	No – relates to biodiversity and green infrastructure generally, not European sites
M128	New paragraph 5.95D – sets out the principles behind the selection of acceptable 'off site' compensation land for biodiversity impacts where 'on- site' compensation is not possible.	This is not a main modification to policy but rather to supporting text. However in this case it inserts important supporting text relevant to biodiversity issues that is not reflected elsewhere in the main modifications so it has been considered in this table. No – this does not relate to European sites but to biodiversity more generally and therefore no likely
M145	Policy CS10 – Added wording to ensure that any new scheme is re-examined and, if town centre expansion is again proposed, a new sequential assessment undertaken to determine whether the need could more appropriately be met within the existing town centre in accordance with Policy CS4 and national policy.	significant effect will result. No. Does not present any potential pathway of impact on European sites.
M146	Policy CS10 – removal of reference to Merseytram project	Minor rewording of policy text to clarify intent and therefore no LSE arises.
M150	Policy CS11 – clarification as to how the sequential test applies to B1 uses	Minor rewording of policy text to clarify intent and therefore no LSE arises.
M151	Policy CS11 – grammatical corrections	Minor rewording of policy text to clarify intent and therefore no LSE arises.
M159	Policy CS13 – insertion of reference to the sequential test	Minor rewording of policy text to clarify intent and therefore no LSE arises.
M162 and M163	Policy CS14 – minor wording changes	Minor rewording of policy text to clarify intent and therefore no LSE arises.
M168	Insertion of new chapter covering Sustainable Urban Extensions (SUEs) and associated policies	The Sustainable Urban Extensions are discussed in Table 2.
-	Policy SUE2 – sets out the development principles for the SUEs	No. This policy sets out the development principles for the SUEs but there is no development principle that would lead to likely significant effects on any European sites. Policies SUE2a to SUE2c are assessed in Table 2 as part of the

Modification number	Modification	Likely Significant Effect (LSE)?
		evaluation of the relevant SUEs.
M169	Policy CS15 - To propose a reduced affordable housing target of 10% for sites in the current urban area to reflect the evidence on viability.	No. Does not present any potential pathway of impact on European sites.
M170	Policy CS15 - To reflect recognition that there are other models for delivery of affordable housing in perpetuity, not necessarily linked to registered housing providers	No. Does not present any potential pathway of impact on European sites.
M179	Policy CS17 - To provide flexibility for proposed national changes to Code for Sustainable Homes / Building Regulations, and noting that for some developments (particularly in areas where development viability is challenging), the cost of meeting Lifetime Homes and Building for Life standards may in conjunction with other requirements be sufficient to place the delivery of the development at risk	No. Does not present any potential pathway of impact on European sites.
M185	Policy CS18 - To provide clarity regarding the Council's intention to prepare policy relating to Gypsy and Traveller / Travelling Showpeople provision, to be set out in a subsequent Local Plan document	Minor rewording of policy text to clarify intent and therefore no LSE arises.
M187 – M189	Policy CS19 - Insertion of cross-references and minor wording clarifications	Minor rewording of policy text to clarify intent and therefore no LSE arises.
M193 – M194	Policy CS20 - To ensure consistency with national policy by including flexibility for public benefits that outweigh harm or loss of heritage assets that is set out in the NPPF	No. Does not present any potential pathway of impact on European sites.
M198	Policy CS21 – minor wording changes	Minor rewording of policy text to clarify intent and therefore no LSE arises.
M199 – M202	Policy CS21 – a series of wording changes and additions regarding the approach to greenspace to provide clarification	Minor rewording of policy text to clarify intent and therefore no LSE arises.
M207	Policy CS22 – minor wording changes regarding carbon reduction	Minor rewording of policy text to clarify intent and therefore no LSE arises.
M208 – M215	Policy CS22 - Deletion of redundant phrases and rewording of sections regarding BREEAM and Code for Sustainable Homes.	Minor rewording of policy text to clarify intent and therefore no LSE arises.
M221	Policy CS24 – minor clarifying wording changes regarding flood risk assessment	Minor rewording of policy text to clarify intent and therefore no LSE arises.
M225	Policy CS25 – clarification of the meaning of a minerals safeguarding area	Minor rewording of policy text to clarify intent and therefore no LSE arises.
M231 – M237	Policy CS27 – various deletions and insertions to provide clarification over infrastructure	No. Does not present any potential pathway of impact on European sites.

Analysis/impact pathways	Site-Specific Likely Significant
	Effect?
	None
	Furthermore, no machanism has
plik-looled goose loost at Silloliswood Moss, separated by the urban area of Kirkby.	Furthermore, no mechanism has been identified for this site to
The scale of development proposed is broadly consistent with the overall quantum of	operate in combination with other
development previously assessed and therefore is not considered to cause any previously	sites or projects/plans in raising a
	likely significant effect that has
	not already been considered in the submission HRA.
	the submission fina.
process. None have been identified in the applicant submissions.	
Considering the nature of the development proposed (residential development) the site is not	
situated in such a way that it would cause disturbance to qualifying bird species through	
is 14km to the north of Bank Lane, Kirkby).	
The site is not located in an area identified based on desk-study analysis as being of particular	
not result in a loss of supporting habitat.	
East of Knowsley Industrial and Business Parks, Kirkby SUE is located 12km east of the	None
located 1.8km south of the major pink-footed goose roost at Simonswood Moss.	It is likely that the separation between this site and
The scale of development proposed is consistent with the overall quantum of development	Simonswood Moss, and the
previously assessed and therefore is not considered to cause any previously unidentified likely	presence of the large Knowsley
significant effect in terms of atmospheric pollution, water resources and water quality relative	Industrial and Business Parks
to European sites which are screened in and assessed within the HRA.	much closer to the roost, will
Considering the nature of the development proposed (residential development) the site is not	mean that any noise associated with construction or operation of
BAD TOUMAUD Cosinis Tind Fighting Ende Tooste	Sank Lane, Kirkby SUE is located 9km north-east of the nearest European site: Mersey Jarrows & North Wirral Foreshore SPA/Ramsar site. It is located 3.4km west of the major ink-footed goose roost at Simonswood Moss, separated by the urban area of Kirkby. The scale of development proposed is broadly consistent with the overall quantum of levelopment previously assessed and therefore is not considered to cause any previously inidentified likely significant effect in terms of atmospheric pollution, water resources and vater quality relative to European sites which are screened in and assessed within the HRA. <i>Moreover</i> , this development is currently subject to a planning application (13/00393/OUT) for pt 0 207 dwellings and therefore any site-specific HRA issues will be addressed through that rocess. None have been identified in the applicant submissions. Considering the nature of the development proposed (residential development) the site is not ituated in such a way that it would cause disturbance to qualifying bird species through netreference with flightlines between a coastal SPA and an inland SPA (e.g. Martin Mere which s 14km to the north of Bank Lane, Kirkby). The site is not located in an area identified based on desk-study analysis as being of particular mportance for pink-footed goose, whooper swan or Bewick's swan, and therefore its levelopment would not result in a loss of supporting habitat. From scrutiny of aerial photography vegetation on site appears to be tussocky and rank trassland with some wasteland components and the site is surrounded by tall dense ledgerows which would disrupt clear lines of sight. This is confirmed by the applicant's habitat urveys. As such is not particularly suitable for SPA birds and therefore its development would to result in a loss of supporting habitat.

## Table 2. HRA analysis of SUEs associated with new policies SUE1 to SUE2c

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Sustainable Urban Extension	Analysis/impact pathways	Site-Specific Likely Significant Effect?
	situated in such a way that it would cause disturbance to qualifying bird species through interference with flightlines between a coastal SPA and an inland SPA (e.g. Martin Mere which is 17km to the north of East of Knowsley Industrial and Business Parks, Kirkby). Site does lie within a tetrad identified based on desk-study analysis as being of some importance for pink-footed goose. However, from scrutiny of photography vegetation on site appears to be tussocky and rank grassland with scrub encroachment and some wasteland components and as such is not particularly suitable for SPA birds and therefore its development would not result in a loss of supporting habitat. However, there are records of SPA/Ramsar bird species using fields adjacent to this area.	this site will not be detectable above the ambient levels. However, this will need to be evaluated at planning application or Supplementary Planning Document stage and there are records of SPA/Ramsar site birds roosting closer to the site than Simonswood Moss. As a worst- case standard noise control measures (such as close-board fencing and cowling of equipment during construction) may be required but this is easily delivered and known to be effective at controlling noise emissions. Furthermore, no mechanism has been identified for this site to operate in combination with other sites or projects/plans in raising a likely significant effect that has not already been considered in the submission HRA.
Policies SUE 1 (identified in clause 1c), SUE 2 and SUE 2a – Knowsley Lane, Huyton (101 dwellings and 17.5ha of employment land)	Knowsley Lane, Huyton SUE is located 11km north of the nearest European site: Mersey Estuary SPA/Ramsar site. It is also 6.4km south of the major pink-footed goose roost at Simonswood Moss. The scale of development proposed is broadly consistent with the overall quantum of development previously assessed (there has been a change in ratio split between employment and residential uses to 80% employment and 20% residential from the 50:50 originally proposed) and therefore is not considered to cause any previously unidentified likely significant effect in terms of atmospheric pollution, water resources and water quality relative to European sites which are screened in and assessed within the HRA. Considering the nature of the development proposed (residential development) the site is not	None Furthermore, no mechanism has been identified for this site to operate in combination with other sites or projects/plans in raising a likely significant effect that has not already been considered in the submission HRA.

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Sustainable Urban Extension	Analysis/impact pathways	Site-Specific Likely Significant Effect?
	situated in such a way that it would cause disturbance to qualifying bird species through interference with flightlines between a coastal SPA and an inland SPA (e.g. Martin Mere which is 22km to the north of Knowsley Lane, Huyton).	
	From scrutiny of photography vegetation on site appears to be primarily pasture and as such would be suitable for SPA birds, although proximity to the M57 and dense urban development to the south may reduce that value through blocking of clear lines of sight and general openness. However, the site is not located in an area identified based on desk-study analysis as being of particular importance for pink-footed goose, whooper swan or Bewick's swan and therefore its development would not result in a loss of supporting habitat.	
	There is now a minimum quantum of employment land specified but this does not present any site-specific impact pathways.	
Policies SUE 1 (identified in clause 1d) and SUE 2 - Edenhurst Avenue, Huyton (74 dwellings)	Edenhurst Avenue, Huyton SUE is located 6km north of the nearest European site: Mersey Estuary SPA/Ramsar site. It is also 8km south of the major pink-footed goose roost at Simonswood Moss. The scale of development proposed is consistent with the overall quantum of development previously assessed and therefore is not considered to cause any previously unidentified likely significant effect in terms of atmospheric pollution, water resources and water quality relative to European sites which are screened in and assessed within the HRA. Considering the nature of the development proposed (residential development) the site is not situated in such a way that it would cause disturbance to qualifying bird species through interference with flightlines between a coastal SPA and an inland SPA (e.g. Martin Mere which is 25km to the north of Edenhurst Avenue, Huyton). From scrutiny of photography vegetation on site appears to be a mown playing field and as such would be suitable for some SPA birds, although less suitable for pink-footed geese. However, the site is not located in an area identified based on desk-study analysis as being of particular importance for pink-footed goose, whooper swan or Bewick's swan and unlike the	None Furthermore, no mechanism has been identified for this site to operate in combination with other sites or projects/plans in raising a likely significant effect that has not already been considered in the submission HRA.
	fields immediately to the east is immediately bounded to north and south by dense urban development which is likely to reduce use. Therefore its development would not result in a loss of supporting habitat.	
Policies SUE 1 (identified in clause 1e) and SUE 2	Land bounded by A58, Prescot SUE is located 10km north of the nearest European site: Mersey Estuary SPA/Ramsar site. It is also 6.2km south of the major pink-footed goose roost	None

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Sustainable Urban Extension	Analysis/impact pathways	Site-Specific Likely Significant Effect?
- Land bounded by A58, Prescot (133 dwellings)	at Simonswood Moss. The scale of development proposed is consistent with the overall quantum of development previously assessed and therefore is not considered to cause any previously unidentified likely significant effect in terms of atmospheric pollution, water resources and water quality relative to European sites which are screened in and assessed within the HRA.	Furthermore, no mechanism has been identified for this site to operate in combination with other sites or projects/plans in raising a likely significant effect that has not already been considered in the submission HRA.
	Considering the nature of the development proposed (residential development) the site is not situated in such a way that it would cause disturbance to qualifying bird species through interference with flightlines between a coastal SPA and an inland SPA (e.g. Martin Mere which is 22km to the north of Land bounded by A58, Prescot).	
	From scrutiny of photography vegetation on site appears to be pasture and a mown playing field and as such would be suitable for some SPA birds, although less suitable for pink-footed geese. However, the site is not located in an area identified based on desk-study analysis as being of particular importance for pink-footed goose, whooper swan or Bewick's swan (although it is adjacent to such a tetrad). Moreover the woodland to the north and the A58 (and its embankments) forming the boundary of the site on three sites will reduce openness and sightlines making this parcel less suitable for SPA birds. Therefore its development would not result in a loss of supporting habitat.	
Policies SUE 1 (identified in clause 1f) and SUE 2 – Carr Lane, Prescot (74 dwellings)	Carr Lane, Prescot SUE (previously identified for housing and/or employment, but now solely for housing) is located 9km north of the nearest European site: Mersey Estuary SPA/Ramsar site. It is also 7.3km south of the major pink-footed goose roost at Simonswood Moss. The scale of development proposed is consistent with the overall quantum of development previously assessed and therefore is not considered to cause any previously unidentified likely significant effect in terms of atmospheric pollution, water resources and water quality relative to European sites which are screened in and assessed within the HRA.	None Furthermore, no mechanism has been identified for this site to operate in combination with other sites or projects/plans in raising a likely significant effect that has not already been considered in the submission HRA.
	situated in such a way that it would cause disturbance to qualifying bird species through interference with flightlines between a coastal SPA and an inland SPA (e.g. Martin Mere which is 24km to the north of Carr Lane, Prescot). Site is not located in an area identified based on desk-study analysis as being of particular importance for pink-footed goose, whooper swan or Bewick's swan and therefore its development would not result in a loss of supporting habitat	

Sustainable Urban Extension	Analysis/impact pathways	Site-Specific Likely Significant Effect?
	From scrutiny of photography vegetation on site appears to be tussocky and rank grassland with scrub encroachment and some wasteland components. As such is not particularly suitable for SPA birds and therefore its development would not result in a loss of supporting habitat.	
Policies SUE 1 (identified by clause 1g), SUE 2 and SUE 2b – East of Halewood (1124 dwellings)	East of Halewood SUE is located 2.5km north of the nearest European site: Mersey Estuary SPA/Ramsar site. It is also 13km south of the major pink-footed goose roost at Simonswood Moss. The scale of development proposed is consistent with the overall quantum of development previously assessed and therefore is not considered to cause any previously unidentified likely significant effect in terms of atmospheric pollution, water resources and water quality relative to European sites which are screened in and assessed within the HRA. Considering the nature of the development proposed (residential development) the site is not situated in such a way that it would cause disturbance to qualifying bird species through interference with flightlines between a coastal SPA and an inland SPA (e.g. Martin Mere which is 28km to the north of East of Halewood). From scrutiny of photography vegetation on site appears to be pasture and arable and as such would be suitable for SPA birds. However, the site is not located in an area identified based on desk-study analysis as being of particular importance for pink-footed goose, whooper swan or Bewick's swan and therefore there is no indication that its development would result in a loss of supporting habitat.	None Furthermore, no mechanism has been identified for this site to operate in combination with other sites or projects/plans in raising a likely significant effect that has not already been considered in the submission HRA. Given its relative proximity to the Mersey Estuary SPA it is considered that bird surveys would be required to judge the value of the site (for example as foraging habitat) but it is not considered that the site is likely to be of importance for SPA birds.
Policies SUE 1 (identified by clause 1h), SUE 2 and SUE 2c – South of Whiston (1503 dwellings)	South of Whiston SUE is located 6.5km north of the nearest European site: Mersey Estuary SPA/Ramsar site. It is also 9.2km south of the major pink-footed goose roost at Simonswood Moss. The scale of development proposed is broadly consistent with the overall quantum of development previously assessed (there has been a slight reduction in the quantum of housing) and therefore is not considered to cause any previously unidentified likely significant effect in terms of atmospheric pollution, water resources and water quality relative to European sites which are screened in and assessed within the HRA. Considering the nature of the development proposed (residential development) the site is not situated in such a way that it would cause disturbance to qualifying bird species through	None Furthermore, no mechanism has been identified for this site to operate in combination with other sites or projects/plans in raising a likely significant effect that has not already been considered in the submission HRA.

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Sustainable Urban Extension	Analysis/impact pathways	Site-Specific Likely Significant Effect?
	interference with flightlines between a coastal SPA and an inland SPA (e.g. Martin Mere which is 24km to the north of South of Whiston).	
	From scrutiny of photography vegetation on site appears to be pasture and arable and as such would be suitable for SPA birds. However, the site is not located in an area identified based on desk-study analysis as being of particular importance for pink-footed goose, whooper swan or Bewick's swan and therefore its development would not result in a loss of supporting habitat.	
Policies SUE 1 (identified in clause 1i), SUE 2 and SUE 2c – Land South of M62 (22.5ha of employment land)	Land South of M62 SUE is located 5.5km north of the nearest European site: Mersey Estuary SPA/Ramsar site. It is also 10km south of the major pink-footed goose roost at Simonswood Moss.	None Furthermore, no mechanism has been identified for this site to
	The scale of development proposed is broadly consistent with the overall quantum of development previously assessed (there is a slight reduction in the hectarage of employment land) and therefore is not considered to cause any previously unidentified likely significant effect in terms of atmospheric pollution, water resources and water quality relative to European sites which are screened in and assessed within the HRA.	operate in combination with other sites or projects/plans in raising a likely significant effect that has not already been considered in the submission HRA.
	Considering the nature of the development proposed (residential development) the site is not situated in such a way that it would cause disturbance to qualifying bird species through interference with flightlines between a coastal SPA and an inland SPA (e.g. Martin Mere which is 25km to the north of Land South of M62).	
	From scrutiny of photography vegetation on site appears to be grassland (possibly pasture), arable and woodland (since the total site area is 77.28ha and only 22.5ha is required for employment land it is assumed that the woodland areas would be largely avoided). The grassland/arable areas could have some suitability for SPA birds. However, the site is not located in an area identified based on desk-study analysis as being of particular importance for pink-footed goose, whooper swan or Bewick's swan and therefore its development would not result in a loss of supporting habitat.	
Policies SUE 1 (identified in clause 2) and SUE 2 - Knowsley Village (1093 dwellings)	This site is not part of the Local Plan Core Strategy allocations but is safeguarded in the Core Strategy in the eventuality that it may be needed for housing in the period after 2028.	Since this site is not specifically allocated for development in the Local Plan Core Strategy, but
	Knowsley Village is located 12km north of the nearest European site: Mersey Estuary SPA/Ramsar site and west of Mersey Narrows & North Wirral Foreshore SPA/Ramsar site. It is also 3.2km south of the major pink-footed goose roost at Simonswood Moss.	merely safeguarded to prevent it being 'sterilised' by other incompatible land uses, its

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Sustainable Urban Extension	Analysis/impact pathways	Site-Specific Likely Significant Effect?
	Considering the nature of the development proposed (residential development) the site is not situated in such a way that it would cause disturbance to qualifying bird species through interference with flightlines between a coastal SPA and an inland SPA (e.g. Martin Mere which is 19km to the north). From scrutiny of photography vegetation on site appears to be pasture and could have some suitability for SPA birds. However, the site is not located in an area identified based on desk-study analysis as being of particular importance for pink-footed goose, whooper swan or Bewick's swan and therefore its development would not result in a loss of supporting habitat. Knowsley Park (which lies immediately east of the safeguarded land at Knowsley Village) is a large (> 1000 ha) Local Wildlife Site (LWS40) which sits between the A580 to the north and the M57 to the south and runs eastwards to the Knowsley borough boundary. The Local Plan Core Strategy modifications include a revision to the boundaries of this site to take account of a change which has already been agreed and is separate to the plan preparation process.	inclusion in the Local Plan Core Strategy cannot lead to a likely significant effect on any European site. Even so, analysis of the impact pathways identified does not indicate that a likely significant effect would result from this development were it to be brought forward prior to 2028. Furthermore, no mechanism has been identified for this site to operate in combination with other sites or projects/plans in raising a likely significant effect that has not already been considered in the submission HRA. Although Knowsley Park is coincident with several tetrads identified as being of moderate to high potential for pink footed geese and other SPA birds it is not considered that proposals to redefine the boundaries of the Local Wildlife Site to exclude this particular site would conflict with its continued use by SPA birds.