

RESPONSE FORM

Knowsley Local Development Framework Core Strategy Preferred Options Report



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Knowsley Council's Core Strategy Preferred Options Report is available to comment on from Monday 27 June 2011 until 5pm on Monday 5 September 2011.

An interactive version of the Preferred Options Report is available on the Council's website at www.knowsley.gov.uk/LDF. Instructions on how to enter responses are provided on the website. This is the Council's preferred method of receiving comments as it will help us to handle your response quickly and efficiently. If you are unable to use the on-line response questionnaire you may submit responses using this form. Further copies can be downloaded from the Council's website, from Council offices, or the form can be photocopied.

Your comments must be received by Knowsley Council NOT LATER THAN 5pm on Monday 5 September 2011.

Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for public inspection. However in compliance with the Data Protection Act, the personal information you provide will only be used by the Council for the purposes of preparing the Council's Local Development Framework.

Please return by email to LDF@Knowsley.gov.uk or by post to Places and Neighbourhoods Manager, Chief Executive's Directorate, Knowsley Council, Archway Road, Huyton, Merseyside, L36 9YU (postage required). If you have any queries, please ring the Council's Places and Neighbourhoods Team on 0151 443 2326.

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Please indicate below which part of the document you are commenting on and use a separate form for each comment

Preferred Options Report or supporting document	PO Report	Preferred Option Reference (e.g. CS12)	Preferred Options CS1, CS3 (iii), CS4 (ii) & (iii) and CS5 (ii).
Page Number		Paragraph / Figure / Table Reference	

Your response

Please enter your comments here. Where appropriate, please include suggestions for changes or improvements.

Before Liverpool could endorse an approach which plans for Green Belt release for employment, and especially for housing use, during the latter years of the Knowsley Core Strategy period it would need to be demonstrated by Knowsley that all efforts to achieve the development of land within existing urban areas have been made, and that Green Belt release is genuinely a last resort, thereby representing the exceptional circumstances required for Green Belt release under national planning guidance.

Liverpool considers this to be particularly important given the close functional and physical linkages between the two authorities, as is well demonstrated by travel to work patterns and recent flows of households, and the important role the Merseyside Green Belt plays in supporting the wider sub-regional strategy of directing investment and development to the conurbation's inner areas, including Liverpool, where there is a substantial resource of vacant brownfield land and buildings and where the essential infrastructure in support of development is already in place.

Liverpool is particularly concerned that, in arriving at its preferred approach, Knowsley may have taken insufficient account of the potential housing supply that lies within its existing urban areas and to a lesser degree within its own housing stock, and that its proposals to release Green Belt land are based on an underestimate of the capacity that potentially lies on urban land. Moreover, although the Core Strategy preferred approach seeks to factor in the impact of Green Belt release on Knowsley's own urban regeneration agenda it does not fully acknowledge at any point the important linkages with, and potential impacts upon, the urban regeneration agendas of neighbouring authorities, despite the demonstrably close functional relationship with Liverpool.

Knowsley's assessment of its urban housing supply is contained within its Strategic Housing Land Availability Assessment (SHLAA). Knowsley's SHLAA is self-evidently a cautious assessment of urban land supply. It can also be considered a partial assessment as it does not factor in potential supply arising from:

- Windfalls, despite the fact that government guidance explicitly allows for a windfall assumption to be factored in to assessments about the post-ten year supply;

- Urban greenspaces, pending an updated Open Space Review in Knowsley, despite the fact, as acknowledged by Knowsley that there may be a substantial amount of greenspaces surplus to open space requirements;
- Other Council landholdings, including surplus schools, again pending the results of an ongoing review;
- Land currently allocated for non-residential uses (such as employment);
- More intensive use of land identified in regeneration areas at Tower Hill and North Huyton;
- Bringing empty homes back into use.

Moreover, the supply that is identified in the SHLAA is subject to a 20% “risk assessment” discount to allow for non-implementation. There is little evidential justification for this discount and no evaluation of the factors presumed to underpin it. If there are genuine reasons why future non-delivery of identified housing sites should be so high these reasons need to be specified and evaluated.

In view of all this, Liverpool is not convinced that Knowsley has adequately demonstrated that its urban land resource has been fully evaluated and the case for Green Belt release is therefore insufficiently proven.

In addition, and as identified in the Overview Study, there is some scope for Knowsley’s housing needs to be accommodated within Liverpool, but this is also not evaluated within the assessment of housing supply. Given too that Liverpool’s own strategy is aimed at reducing net outflows of population and households to adjoining districts and elsewhere - within which net outflows to Knowsley have historically comprised the larger part – Liverpool considers that a closer evaluation of the impacts of changes to those flows is warranted before a commitment is made to Green Belt release in Knowsley.

Similar considerations apply with respect to employment land in Knowsley (Preferred Option CS4 especially (ii) and (iii)). The Overview Study suggests that, since the estimates of supply of and demand for this land should be treated with some caution (on account of the limitations of the methodology used in their preparation), the resulting figure for shortfall of land for employment on existing allocations in Knowsley might be something of an over-estimate. In addition, potential scope for accommodating some of its land requirements in St. Helens, as noted in the Study – particularly in the longer term, when release of Green Belt land in Knowsley might be considered – is not explored in the Preferred Options document.

In summary Liverpool considers that Knowsley’s proposed commitment to a degree of Green Belt release may be premature. In doing so, Liverpool acknowledges that various fail-safe mechanisms are to be built in to the strategy to ensure that Green Belt development does not impact adversely upon Knowsley’s urban regeneration agendas, but is concerned that these mechanisms may not actually achieve those aims. Moreover, and as highlighted above, there is no explicit assessment nor acknowledgement, of the importance of minimising adverse impacts upon the regeneration agendas of neighbouring authorities such as Liverpool.

This comments below specifically focus on the intended operation of the fail-safe or ‘trigger mechanism’ to be employed by Knowsley Council to bring forward Green Belt land for housing development after the delivery of housing on sites located within Knowsley’s urban areas (Preferred Options CS3 (iii) and CS5 (ii)).

Knowsley’s Spatial Strategy seeks to ensure housing development occurs within its urban areas in the early part of the plan period while in the latter and post (2027) plan period

housing growth should be accommodated within identified broad locations in the Green Belt. The Core Strategy proposes a release mechanism to manage the switch of housing development location from urban area to Green Belt. However, there are number of concerns as to how the release mechanism is proposed to operate.

Premature Release - Green Belt policy states the broad locations would be removed from the Green Belt and rather than proposing a review of the Green Belt, the Core Strategy is concluding that review with proposed changes, which upon adoption of the Core Strategy would mean that these broad locations would cease to be Green Belt. Only the exact boundaries of the broad locations remain to be determined. The practical means by which removal without precise determination of boundaries is made is however unclear.

Once, therefore, these broad locations are removed from Green Belt through Core Strategy adoption and it is not clear what status they would have prior to a further development plan document defining their exact boundaries. The release mechanism only addresses the timing of development within these locations rather than releasing the land from Green Belt.

Further, given that the Preferred Options Report states the urban areas contain sufficient land for ten years of housing supply and the first priority is to maximise the successful delivery of urban regeneration, the City Council questions the necessity for an immediate release of Green Belt land at the outset of the plan period. Particularly, when 'plan, monitor, and manage' will be used to assess the effectiveness of the spatial strategy.

Taken together these features of Knowsley Council's approach may impair its ability to achieve sustainable development across the borough.

The emphasis on maintaining a five-year housing supply - The effectiveness of the release mechanism to determine the urban areas to be prioritised before the broad locations is undermined by the emphasis on maintaining a five-year supply for housing land. The Core Strategy acknowledges the flexibility offered by maintaining a five year supply to address emerging deficits in supply, which should such deficits occur, would put pressure on bring forward locations that were formerly in the Green Belt.

Consequently, locations identified initially to meet the longer term development needs may be developed in advance of sites which would contribute to the urban regeneration focus of the Spatial Strategy and as a result the expense of the latter.

Operation of Green Belt Broad Locations development mechanism – whilst the policy statement highlights that the first priority for housing shall be the existing urban area and release of the broad locations must not undermine the urban regeneration objectives this is offset by permitting locations proposed for housing to be granted to maintain a five year deliverable supply.

In effect, the trigger mechanism is likely by default become the need for maintenance of a five year housing supply.

The application of the trigger mechanism to determine the spatial pattern of development strictly only applies to the phasing of the development of the three categories of broad locations, sequenced as firstly Reserved Tier 1 locations, followed by Reserved Tier 2 locations, and post 2027 Safeguarded locations.

Whereas, the relationship between the urban areas and Green Belt vis-à-vis housing development is managed only in general terms by the overall spatial development

strategy and a phasing approach which seeks to 'ensure a five year supply to support the efficient use of available land and protection of urban regeneration priorities'. As regards the phasing approach, the concern is that achieving urban regeneration priorities is undermined by the need to ensure a five year supply.

Please append extra sheets as required

Signature		Date	
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