

Knowsley Local Plan: Core Strategy

Examination in Public

Mopping Up Session (21.11.13) Note on policy options concerning short term land supply for housing and employment land

Submitted by Knowsley MBC, 20 November 2013

1. Introduction

- 1.1 This note has been prepared by Knowsley MBC following the hearing sessions on matters 3 and 4. At the sessions on these matters, the Inspector asked the Council to prepare revised estimates of the realistic rate of delivery on sites within the current land supply for housing and employment development. This work is necessarily complex and still ongoing at the time of writing this note (some 5 working days after publication of the Inspector's note concerning the housing sites and 2 working days after the Inspector's request concerning employment sites).
- 1.2 In view of the short timescale available to prepare this note, it does not constitute an agreed policy position by the Council. It does however inform the policy options which the Council accepts that it **may** be required to consider **if** the Inspector concludes (on the basis of the proposed revised risk assessments referred to above) that:-
- the land supply for housing development falls short of that which is required to be deliverable within 5 years under paragraph 47 of the National Planning Policy Framework (NPPF); and/or,
 - the short-term land supply for employment development is unlikely to deliver a sufficient quantum or range of sites (by location, size, sectoral split or quality) within the early years of the Plan period.
- 1.3 Although the NPPF does not explicitly require a 5-year deliverable supply for employment in the same way as it does for housing, the Council considers it appropriate to cover employment alongside housing in this note.
- 1.4 Should the Inspector conclude that the submitted Knowsley Local Plan: Core Strategy (KLPCS) is not "sound" due to the short-term land supply issues, the Council would need to consider the matter further before deciding whether to propose formal modifications to the KLPCS. Any potential modifications which arise from this assessment would need to be formally approved by the Council's Cabinet before being considered for inclusion in any version of the KLPCS which is finally adopted.

- 1.5 The Council also recognises the fundamental importance of local consultation prior to adopting any changes to the KLPCS and would therefore carry out an appropriate public consultation exercise before considering whether to include such changes in any version of the KLPCS which is finally adopted by the Council.
- 1.6 In the event that the Inspector does opt to issue interim findings concerning the soundness of the Plan, the Council would wish to consider those findings, following which there would be likely to be a number of steps before a revised Plan could be adopted. Those steps might include:-
- Cabinet approval to consult on any modifications;
 - Consultation;
 - The Inspector considering the outcomes of the consultation (potentially at future reconvened hearings)
 - The Inspector preparing and issuing his final report; and,
 - Adoption of the revised Plan by a full meeting of the Council.

2. The options available to make up a potential shortfall in the 5-year land supply for housing

- 2.1 In the event that the Inspector concludes that there is a shortfall in the deliverable land supply for housing for the 5-year period up to 31 March 2018, the Council may need to consider a range of options. Taking account of the debate to date at the hearings, the Council considers that the options set out in paragraphs 2.2 to 2.12 below could help to frame the discussion at the "mopping up" session on 21 November 2013. Once again, it is important to emphasise that the Council would wish to consult the local community on any option supported by the Inspector and there would need to be a subsequent process such as that outlined in paragraph 1.6 above.

Option 1 – Converting all of the "reserve" locations proposed for housing into site allocations in the KLPCS

- 2.2 Option 1 would affect all of the sites which are currently identified in paragraph 5.50 of the KLPCS as "reserve" locations for longer term release from the Green Belt for housing. This option could involve:-
- changing these sites from "reserve" locations to proposed site allocations and identifying the sites as such on the Council's Policies Map;
 - introduction of new policies in the KLPCS to guide the development of the sites, including "strategic site" policies to cover the larger sites as indicated below;
 - removal of the phasing mechanism and related aspects of policy CS5, which limited the release of land for development dependent on the Council's maintenance of a 5-year land supply; and,

- consequential revisions to other Plan policies.
- 2.3 This option comprises essentially a re-programming of the trajectory in figure 5.1 of the Plan which currently indicates delivery could (subject to their allocation in the future Local Plan: Site Allocations and Development Policies and the monitoring arrangements set out in the Plan) potentially commence within those Green Belt locations indicated within the Plan from 2020/21. This option could therefore mean the quicker release of these sites.
- 2.4 The sites are of widely differing sizes and are likely to have implications to a greater or lesser extent on the strategic transport network, utilities, schooling, health and other infrastructure. Whilst on the basis of its consultation with infrastructure providers and existing evidence base, the Council is satisfied that infrastructure requirements could be met (hence the identification of the sites as reserve locations in the KLPCS), it would wish to extend its evidence base to gain further information on these matters before the sites were actually allocated. This is so that the detail of strategic site allocation policies could be developed for the larger sites and any limitations on phasing arising from short term infrastructure capacity constraints could be identified and addressed. This point particularly applies to the larger sites discussed in paragraphs 2.5 to 2.7 below.
- 2.5 The land at South Whiston (KGBS14) is considered to be a strategic site having a notional dwelling capacity of 1,532 dwellings¹. It is also in multiple ownerships. Due to its scale and complexity, the Council considers it essential that the development of this site follows a comprehensive approach. This would need to be led by a robust and independently examined "strategic site" policy for this site which would need to be introduced alongside any site allocation for this site. This would be likely to require any planning application(s) to be developed in the context of the wider strategic master planning of the site and set out the Council's broad expectations concerning matters, such as phasing and infrastructure and a broad range of other matters. This strategic policy could provide the basis for any future Supplementary Planning Document affecting this site.
- 2.6 A study is already under way for this site (the South Whiston and Land South of M62 Infrastructure Capacity and Development Options Study) which should be available to be published early in 2014.
- 2.7 The "reserve" locations at East of Halewood (KGBS19 and 20) and at Knowsley Lane (KGBS7) are also considered by the Council to be of strategic scale. The land at East of Halewood has a notional dwelling capacity of 1,124 dwellings, whilst that at Knowsley Lane is proposed for mixed residential and employment uses with a notional capacity of 252 dwellings and 10.68 hectares of employment land. Due to the scale of these sites, further

¹ The notional development capacities of the Green Belt locations set out in this note are sourced from the Council's Green Belt Technical Report (examination library ref: TR03)

engagement with infrastructure providers (and potentially further studies) would be likely to be needed to address any implications of bringing forward the development of the sites to earlier in the Plan period. In the case of the land at Knowsley Lane, there would also be likely to be a need for specific policy guidance to ensure that the employment element was preserved as part of the mix of uses on the site and to ensure that the development of the site integrated successfully with the North Huyton Principal Regeneration Area.

- 2.8 The other sites are all smaller and hence not considered to be strategic in nature, but may also require specific policy guidance to cover aspects of their development. For example, the development of the land at Bank Lane, Kirkby (KGBS1) should in the Council's view be of a form which integrates successfully with the proposed regeneration expected to take place at the nearby Tower Hill Regeneration Area. The land at the A58, Prescot (KGBS8) should be of a particularly high quality design given the location of the site at a gateway approach to the Prescot Town Centre Conservation Area.

Option 2 – Converting some of the "reserve" locations proposed for housing into site allocations in the KLPCS

- 2.9 Option 2 would be to allocate some – but not all - of the sites proposed for release from the Green Belt for potential development before 2018. In theory, this option could help to ensure a phased and controlled approach which would help to preserve the priority given to regeneration areas in the early years of the Plan period.
- 2.10 There would be a need to develop a clear rationale as to why some and not all sites would be allocated in the "first tranche". In addition, for those sites which were not in the "first tranche", a mechanism would need to be developed to govern the timing of their release (taking account of the fact that the first tranche would have been added to the 5-year supply). Furthermore, the sites which are most distant from the housing-led Principal Regeneration Areas at North Huyton and Tower Hill (and which therefore would theoretically have the least impact on their delivery) include the largest "reserve" sites at South Whiston and East Halewood. The land at South Whiston in particular is considered likely to have a long potential "lead in" time before completions can start on site, due to the need to assemble land, complete master planning exercises, provide infrastructure and develop a comprehensive approach to developer contributions across all parts of the site. Any strategy which relied to a significant degree on early delivery in this site could therefore carry significant risk in delivery terms.

Option 3 – Keeping the "reserve" locations as "reserve" locations but removing the phasing mechanism in policy CS5

- 2.11 Option 3 would be to keep the "reserve" locations for future housing as "reserve" locations, but remove the phasing mechanism from policy CS5 to allow delivery within them before 2018. Under this option, any detailed

policies covering how these sites would be developed would be included in a future Local Plan document.

- 2.12 This option suffers from the potential disadvantage that it would provide no detailed policy guidance against which to assess any planning applications which may be received in the short-term following adoption of the KLPCS. Furthermore, the Council has already identified appropriate boundaries for the sites (via the Green Belt Study) and is developing evidence on infrastructure requirements to the level which is appropriate to inform site allocations. If the phasing mechanism were to be removed in any event there is therefore no point in delaying the site allocations until a future Local Plan document.

Summary of position relating to options 1 to 3

- 2.13 As part of its case to the hearing sessions, the Council has expressed concern that the early and uncontrolled release of Green Belt sites could (particularly if all the sites were to come forward at approximately the same time) adversely affect the delivery of regeneration priorities. The Council remains of the view that the phasing mechanism set out in policy CS5 forms an integral part of the KLPCS in its current form, as it aims to ensure that the pace of regeneration programmes (including in some locations the replacement of previously demolished properties) is not jeopardised. This approach aims to put into effect the 5th purpose of Green Belts as set out in paragraph 80 of the NPPF, which is to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 2.14 Nevertheless the Council acknowledges that the Inspector has expressed concerns regarding the 5-year housing land supply. This is a matter to which the Council may need to give further consideration should the Inspector consider it necessary and appropriate to pursue any option other than that set out in the KLPCS in its current form.

3. Employment Land

- 3.1 Four of the "reserve" locations proposed for removal from the Green Belt are identified for employment either as a sole use on the site or as part of a mix with other uses. The KLPCS as submitted identifies (under policy CS5) that these sites will be released for development only when necessary to maintain a 5-year supply of deliverable employment sites in quantitative terms or a satisfactory range and choice of sites in qualitative terms.
- 3.2 As is the case with housing (see section 2 above), there are a range of options which could be considered to address any shortfall of deliverable land supply which may be found by the Inspector to exist for employment uses for the 5-year period up to 2018. These are similar to the three options considered above for housing and include:-

1. Converting all the reserve locations proposed for employment into site allocations in the KLPCS; or,
 2. Converting some of the reserve locations into site allocations in the KLPCS; or,
 3. Keeping the reserve locations as reserve locations but removing the phasing mechanism in policy CS5.
- 3.3 As is the case for the housing sites, the Council considers that the phasing mechanism set out in policy CS5 for employment sites is consistent with purpose 5 of Green Belts as it will help ensure the focus of investment in the early years of the Plan period is in current urban areas. However, it is acknowledged that the Inspector has expressed concerns regarding the deliverability of sites in the current urban area and that the Council may need to consider alternative approaches if the Inspector considers this to be necessary. Similar considerations are likely to apply to the 3 options set out above for the employment sites as are set out in relation to the housing sites in section 2 of this note.
- 3.4 There are also some site specific issues which need to be taken into account for the employment sites, as set out below.
- 3.5 The site at Knowsley Lane Huyton (KGBS7) is proposed for a mix of housing and employment uses. If the housing sites are brought forward as a site allocation (see section 2 above), it may in the Council's view be appropriate to include the employment element of this site in the allocation. This is irrespective of the Inspector's conclusions regarding whether there is currently a satisfactory short-term deliverable supply for employment sites. As stated in paragraph 2.7 above, the Council may decide to include a specific policy requirement for a minimum quantum of employment development to be delivered on this site to ensure the site makes a satisfactory contribution to overall employment land needs.
- 3.6 In the event of the Inspector supporting option 1 above in relation to housing, the site at Cronton Colliery (KGB17) (appropriate for employment uses) could potentially appropriately be addressed as part of the same "strategic site allocation" policy as the land to the South of Whiston (KGBS14) (appropriate for residential uses). This would help to ensure that cumulative infrastructure requirements connected with the two sites (e.g. impacts on the M62 junction 6, public transport provision and the proposed Whiston - Cronton Colliery green cycle link) are dealt with in a holistic way.
- 3.7 The Council accepts that the site at Carr Lane, Prescot (KGBS10) is likely to only come forward for employment if the neighbouring land at South Prescot Principal Regeneration Area remains as an employment site. If the current outline permission for the adjacent land in South Prescot is implemented, the land at Carr Lane is likely to most appropriately also be developed for housing.

4. Conclusion

- 4.1 None of the options set out in this note constitute current Council policy. The options which are set out in this document are intended solely to inform the debate about short-term land supply which is expected to take place at the "mopping up" session for the hearings on 21 November 2013.