

KNOWSLEY LOCAL PLAN: CORE STRATEGY

KNOWSLEY METROPOLITAN BOROUGH COUNCIL

HEARING STATEMENT 2

Matter 2 SPATIAL DEVELOPMENT STRATEGY AND PRINCIPLES

Issue: Whether the strategy of development within urban areas (focusing on regeneration areas) followed by urban extensions to meet longer term needs, represents a sustainable approach to growth which pays sufficient regard to the environmental and other constraints of the borough.

Questions

2.1 Is the principle of maintaining the settlement hierarchy and focusing growth on existing urban areas, followed by urban extensions when required in the longer term (policy CS 1), based on a sound assessment of the socio-economic and environmental characteristics of the area and the impacts of the proposals?

2.1.1 The strategy of maintaining Knowsley's settlement hierarchy and focussing growth in existing areas, followed by longer term urban extensions is sound and is the most appropriate for the Borough given the available evidence.

2.1.2 The strategy reflects Knowsley's role as a mainly suburban area, including several significant settlements of similar sizes and functions. Knowsley's settlements link strongly to Liverpool and other surrounding areas due to physical proximity, transport routes, and shared labour and housing markets. Evidence for this is summarised in the Spatial Profile Technical Report (TR05). There is no evidence to suggest that any of Knowsley's settlements should significantly expand or contract their role relative to each other or to other settlements in the wider sub-region.

2.1.3 The Council's comprehensive evidence base (for example the Spatial Profile Technical Report (TR05)) clearly indicates that improvements to the socio-economic circumstances and fabric of the existing urban environment in Knowsley are required. These objectives can only be met by maintaining a focus on provision of new homes and jobs in existing urban areas and applying this in all of Knowsley's settlements.

2.1.4 This approach was supported by the former North West Plan: Regional Spatial Strategy to 2021 (RSS) (PG18) which established that development of appropriate scale would be encouraged in larger accessible suburban centres with identified needs for regeneration, such as Knowsley. It aimed to tackle worklessness and address housing market restructuring in such areas.

2.1.5 The priority given to development in the urban area accords with the purposes of the Green Belt (including assisting in urban regeneration). The Plan and its

evidence base demonstrate however that urban expansion is needed in the longer term to provide additional land for housing and employment development above that which is available in the urban area. The strategy will enable such urban expansion to take place in the most suitable places, and in a way which is phased and led by the development plan process.

2.1.6 The impacts of the strategy have been examined extensively in the KLPCS evidence base. The principle of maintaining the settlement hierarchy and focussing growth in existing urban areas has also been broadly supported by many stakeholders in response to consultation at different stages of plan preparation. The Core Strategy Sustainability Appraisal (SD07) and other assessments have indicated that the approach is likely to positively impact on a range of social, environmental and economic criteria.

2.2 Is the strategy sufficiently “spatial”, i.e. does it appropriately address the particular characteristics, roles and functions of individual settlements and areas?

2.2.1 The characteristics, roles and functions of Knowsley’s settlements and the Borough as a whole are strongly reflected in the vision, objectives and policies of the Plan.

2.2.2 Policy CS1 establishes a clear spatial strategy for the future role and function of Knowsley’s large suburban centres and rural villages. The suitability of, and opportunities which exist in, these locations for new housing and economic development are evidenced in the Housing Position Statement (SD22), the Strategic Housing Land Availability Assessment (EB01) and the Employment Position Statement (SD23). The six Principal Regeneration Areas (PRAs) identified in policy CS1 have been selected based on the particular challenges and opportunities for regeneration in each area up to 2028.

2.2.3 Chapter 6 "Area Priorities" of the KLPCS sets out specific issues affecting each area based on their different roles and character, as informed for example by the Spatial Profile Technical Report (TR05). Policies CS9 to CS14 set out a range of realistic interventions which will deliver necessary economic, social and environmental change during the plan period in each of the six PRAs. These are based on the local characteristics, role and function of each area. The area specific nature of the approach is also reflected in the distribution of PRAs which cover parts of all the townships apart from Halewood. Further details of the specific approaches to each PRA are included in the response to Question 2.3 below.

2.2.4 In this respect, it is notable that the Council has chosen not to identify a PRA in Halewood. This reflects an absence of evidenced need and opportunity for a location specific approach to regeneration through strategic development within the urban area, following the successful delivery of the new district centre.

2.2.5 The spatial nature of the strategy is also reflected in the approach towards review of Green Belt boundaries. The process of selecting the areas identified

for removal from the Green Belt in the KLPCS has strongly reflected location-specific evidence in the Knowsley and Sefton Green Belt Study (EB08) and the Technical Report: Green Belt (TR03). This evidence has included the physical characteristics of the sites, local regeneration needs, sustainability considerations and deliverability. These locations are intended to provide sufficient capacity to meet strategic housing and employment needs during the plan period and beyond, where growth is considered to be appropriate and sustainable.

- 2.2.6 The characteristics, roles and functions of individual settlements and areas have also informed the scale and types of development that are suitable in the “reserve” locations. For example, the large sustainable urban extensions proposed in South Whiston and Halewood, where development opportunities in the nearby urban area are comparatively limited, will enable these settlements to more effectively contribute towards overall housing growth in Knowsley. In contrast, the urban extensions in Huyton, Kirkby and Prescot are of a smaller scale which will complement the existing capacity for growth in these settlements.
- 2.2.7 In addition, Policy CS1 outlines that areas within Knowsley’s existing Green Belt will be considered for future development. Policy CS5 outlines the broad locations for this policy to be applied, the selection of which strongly reflects location-specific evidence in the Knowsley and Sefton Green Belt Study (EB08) and the Technical Report: Green Belt (TR03).

2.3 Is the identification of principal regeneration areas appropriate and derived from the evidence? What mechanism/process would be used to identify “other areas requiring regeneration”?

- 2.3.1 The PRAs have been identified on the basis of evidence of the need for and deliverability of strategic scale regeneration in these areas as set out below.
- 2.3.2 North Huyton and Stockbridge Village: Much of North Huyton falls within the 1% most deprived in the Country (Index of Multiple Deprivation 2010 - Rank of Super Output Area score measure, CLG 2011). The area was designated under the former National Strategy for Neighbourhood Renewal as a “New Deal for Communities” (NDC) area and as an Action Area in the Knowsley Replacement Unitary Development Plan (Policy H3 (PP01)). Although the NDC funding only ran from 2001 until 2011 a developer partnership (the Revive Consortium) remains in place to deliver the remainder of the development. Planning permission was granted in 2007 for a scheme which would replace about 1,200 demolished properties and provide 1,450 new build dwellings.
- 2.3.3 The PRA designation will enable the completion of replacement dwellings and implementation of the extant North Huyton Action Area Supplementary Planning Document (PP05). As set out in the Housing Position Statement (SD22) there is remaining capacity for 1,282 dwellings to be completed in accordance with the original outline permission. The KLPCS also identifies

scope (subject to appropriate master planning) to increase the density and therefore capacity of development in North Huyton.

- 2.3.4 This PRA also includes Stockbridge Village. The district centre at Stockbridge Village has recently been comprehensively regenerated as described in paragraph 6.13 of the KLPCS. As in North Huyton, levels of deprivation are extremely high in Stockbridge Village and there is a clear need to promote regeneration in the housing areas which surround the village centre. The SHLAA process (SD22) has identified a significant range of sites suitable for residential development within Stockbridge Village. These sites are within Council or Registered Provider ownership and, subject to future master planning, present a significant opportunity to rebalance the housing market within this area.
- 2.3.5 Kirkby Town Centre: The Knowsley Town Centres and Shopping Study – Stage 1 (EB12) identified the need for a critical mass of development in Kirkby Town Centre to provide new comparison and convenience retailing. This town centre has suffered from a significant decline as a retail destination, lack of investor confidence and poor levels of expenditure retention in serving the needs of its catchment area. Based on these findings the Knowsley Town Centres and Shopping Study – Stage 2 (EB13) recommended that the majority of growth of retail capacity in the Plan area be focused in Kirkby. The PRA designation will help deliver the required comprehensive regeneration which will include an expansion of the town centre to the south in accordance with an outline permission granted in 2011 (planning reference: 10/00505/OUT) (see CR08).
- 2.3.6 Knowsley Industrial and Business Parks: Knowsley Industrial and Business Parks are sub-regionally important as they comprise the largest mainly industrial area within the Liverpool City Region. The Joint Employment Land and Premises Study (EB07) identifies scope to remodel parts of Knowsley Industrial Park, to maximise job opportunities and contribute to Knowsley's employment land requirement. This potential contribution reflects the scale of the existing provision and requires a strategic approach to encourage sustainable economic growth and ensure sufficient adaptability to accommodate the needs of new and emerging employment sectors. The Delivering a New Future for Knowsley Industrial Park: Strategic Framework (EB17) and Knowsley Industrial Park Energy Network Feasibility Study (EB18) documents informed the approach in KLPCS policy CS11.
- 2.3.7 Tower Hill, Kirkby: Tower Hill is designated as an Action Area in the Knowsley Replacement Unitary Development Plan (Policy H3 (PP01)). The extant Tower Hill Action Area Supplementary Planning Document (PP06) supports this designation. Regeneration is needed in this area to address high levels of deprivation and improve the range and quality of housing stock. Policy CS12 reflects these objectives and will allow appropriate flexibility for an increased level of housing development subject to appropriate master planning. Evidence of available land capacity for growth is provided in the Strategic Housing Land Availability Assessment – 2012 Update (EB01), and

Greenspace Audit (EB12) however further work is required in terms of master planning as mentioned in policy CS12.

- 2.3.8 South Prescott: South Prescott includes significant areas of land previously occupied for industrial uses, and was allocated for employment uses in the Knowsley Replacement Unitary Development Plan (Policy EC2 (PP01)). A small proportion of the area has been developed, but a large proportion remains vacant. The Joint Employment Land and Premises Study (EB07) and Housing Position Statement (SD22) indicate that the location could be suitable for either residential or employment purposes or a mixture of these. Planning permission was granted for a mixed use development to comprehensively regenerate the area in 2013 (planning ref: 11/00385/OUT). Given the scale of the area, its strategic location (with excellent transport connections and proximity to Prescott town centre) and the need to remediate this area of brownfield land, it is appropriate to allocate this area as a PRA.
- 2.3.9 Prescot Town Centre: Prescot Town Centre is a historic town centre which includes a Conservation Area. In common with many traditional town centres it is experiencing challenges arising, for example from competition from elsewhere and the suitability of its building stock for modern retailing. The Knowsley Town Centres and Shopping Study – Stages 1 and 2 (EB12 and EB13) identify a need to improve linkages to the nearby Cables Retail Park, whilst preserving and enhancing the historic character of the area, as supported by the Prescot Town Centre Conservation Area Character Appraisal (AD18). The approach in policy CS14 reflects the local distinctiveness of Prescot Town Centre and the need for intervention and investment to maximise its heritage assets. The current Prescot Townscape Heritage Initiative funding will utilise the historic environment as a catalyst for regeneration. Policy CS14 will support delivery of tourism and cultural opportunities in the town centre which are recognised in the Liverpool City Region Visitor Economy Strategy to 2020 (LC09).
- 2.3.10 The Council does not envisage allocating additional PRAs unless via a future review of the KLPCS. The reference to “other areas identified as requiring regeneration” in policy CS1 clause 4 is intended to acknowledge that regeneration needs and smaller scale (i.e. non-strategic) opportunities also exist outside the PRAs. This approach will support delivery of smaller scale regeneration initiatives which may be highly important at the neighbourhood level and will build flexibility into the Plan. Many areas outside of the PRAs suffer from local deprivation issues (as evidenced by Map 2.3 on page 3 of the KLPCS). The KLPCS therefore facilitates appropriate actions for such issues to be addressed and provides further guidance in paragraph 6.4.
- 2.3.11 The Council may decide to provide more detailed policy criteria under which to assess smaller scale regeneration proposals outside the PRAs in the Local Plan: Site Allocations and Development Policies (KLPSADP). This document could also allocate sites for development (e.g. residential, retail or employment development) in such areas subject to evidence being provided about the appropriateness of any allocations and their likely regeneration benefits.

2.3.12 The Council considers that a potential modification to policy CS1 may help to clarify the purpose of clause 4 of the policy and to clarify that regeneration activity outside the PRAs should be appropriate in terms of evidenced needs and opportunities.

Potential Main Modification*

Amend policy CS1 clause 4 to read:

"This approach will also apply in other areas identified as requiring regeneration within Knowsley subject to funding availability. Regeneration will be promoted outside the Principal Regeneration Areas where this is of a scale and nature which meets the needs and opportunities in these areas".

2.4 Is the strategy for the Green Belt in policy CS 1 consistent with the National Planning Policy Framework (NPPF)? Does the use of Green Belt land for development satisfy the "exceptional circumstances" test of national policy and if so, for what reason? Should the use of Green Belt land be limited to meeting "longer term" needs?

Consistency of policy CS1 with the NPPF

- 2.4.1 The spatial development strategy for Knowsley in policy CS1 seeks to deliver the Plan's Vision and Strategic Objectives by providing a framework for development whilst addressing wide ranging planning considerations.
- 2.4.2 In accordance with the presumption in favour of sustainable development (paragraph 14, NPPF) the policy outlines an appropriate spatial strategy which meets Knowsley's strategic and regeneration needs including objectively assessed needs for housing and employment development.
- 2.4.3 The policy provides for the timely and phased delivery of a range of development sites whilst balancing development requirements against the need to minimise negative sustainability or strategic impacts where possible.

Meeting the "exceptional circumstances" test

- 2.4.4 To support the preparation of the KLPCS the Council identified what the requirements for residential and economic development are likely to be over the plan period up to 2028. These requirements are evidenced by the Housing Technical Report (TR01) and Employment Technical Report (TR02), which also demonstrate that there is not enough suitable land in the current urban areas to meet requirements up to 2028. The most recent housing and employment land supply position is presented in the Housing and Employment Position Statements (SD22 and SD23 respectively).
- 2.4.5 Noting this shortfall, the Council has examined a range of options for meeting the Borough's development requirements. These are summarised below:

- Identifying scope for neighbouring authorities to accommodate development needs - evidenced by the Liverpool City Region Overview Study (LC03/03a) and consultation with neighbouring authorities at statutory stages in the Plan preparation process. The Duty to Co-operate Statement (SD14) confirms that none of the neighbouring authorities are able to meet Knowsley's needs.
- Identifying appropriate standards for Public Open Space (EB21) and Outdoor Sporting (EB22) facilities and releasing sites where appropriate - evidenced by the Greenspace Audit (EB21) and Playing Pitch Assessment (EB22) which identified a limited amount of surplus land that has been appraised by the SHLAA process.
- Identifying surplus Council owned land - the Council reviewed all its land assets, with suitable surplus sites being considered by the SHLAA process. The latest schedule of Council sites is available at Appendix D of SD22.
- Remodelling and/or intensified development within Principal Regeneration Areas and other urban sites – evidenced by a revised policy approach to PRAs at North Huyton and Stockbridge Village, South Prescott and Tower Hill, Kirkby allowing additional flexibility regarding development capacity.

2.4.6 Whilst additional supply has been realised by the Council's work there is still a significant cumulative deficit when compared to longer term requirements. Taking into account the findings of the evidence base and the need to ensure delivery of Knowsley's housing and employment requirements, the Council considers that 'exceptional circumstances' exist for a localised review of the Green Belt.

2.4.7 To identify the most appropriate and sustainable locations for Green Belt release, TR03 considered additional 'alternative' locations¹ alongside those recommended for consideration by EB08. This process involved an SA/SEA (SD08/08a) of such locations and concluded there were no other appropriate locations for development. For each location recommended for release by TR03 the sustainability and strategic benefits of releasing the site are considered against the impact on Green Belt principles. The conclusion of this exercise was the determination of whether 'exceptional circumstances' for the release of each location exists (Table 4.3, page 43-57 (TR03)).

Use of Green Belt land for longer term needs

2.4.8 The spatial development principles in policy CS1 require an initial focus on areas in need of regeneration and other urban areas followed by the release of sustainable Green Belt locations to meet longer term needs, subject to the phasing mechanisms in policy CS5.

¹ Put forward by representors at Core Strategy 'Preferred Options' stage (see SD04)

- 2.4.9 This approach is informed by the availability and deliverability of urban sites, as evidenced by the Housing Position Statement (SD22) and Employment Position Statement (SD23) and housing trajectory (figure 5.1, KLPCS).
- 2.4.10 As explained in response to Question 2.3 above the housing and/or employment led PRAs identified in policy CS1 (clause 3) have been selected based on the particular challenges and opportunities for regeneration in each area up to 2028. The deliverability of regeneration in these areas is evidenced by SD22 and SD23 as appropriate. The suitability of this evidence concerning housing and employment land is discussed in the Council's response to Questions 3.13 and 4.5 respectively.
- 2.4.11 Due to the availability and deliverability of urban sites within Knowsley early in the plan period (figure 5.1, KLPCS) it is considered appropriate to 'phase' Green Belt release until such land is required (in line with clauses b-d, policy CS5). This approach is needed to support the delivery of development in the PRAs (within which viability for many forms of development is challenging) and other sustainable urban sites whilst ensuring that Knowsley's longer term requirements are met. This approach also allows flexibility should the supply of urban sites change in future years.
- 2.4.12 Releasing all the Green Belt locations on adoption of the Plan would be likely to result in a surge of housing supply of potentially deliverable sites early in the plan period. Whilst this may help to address the evidence of previous backlog of demand there is a risk that the pace of much needed regeneration in the PRAs could be affected. In this scenario it is unlikely all locations (i.e. urban and Green Belt) would be brought forward simultaneously, as it would require a level of development rarely seen in Knowsley and that is unlikely given the current economic climate. Therefore, it is likely that more challenging locations would not be brought forward as currently anticipated.
- 2.5 If the spatial strategy is considered unsound, what alternative strategy should be pursued, and why? Is there any compelling evidence that the growth sought in the KLPCS could be achieved *without* requiring Green Belt land and if so, on what basis?**
- 2.5.1 The Council's firm view is that the spatial strategy in the KLPCS is sound as it is the most appropriate strategy given the reasonable alternatives, supported by evidence, and consistent with national policy. A wide range of alternative spatial strategies and approaches have been considered but discounted in favour of the preferred strategy as evidenced below.
- 2.5.2 Alternatives have been considered in depth through early stages of plan preparation and consultation. The Core Strategy Issues and Options Paper (CS06) presented three strategic options for the spatial development of the Borough and a broad range of thematic policy options. The Core Strategy Preferred Options Report (CS04) set out a range of discounted policy options for different topics. At each stage, options have been subject to extensive public and stakeholder consultation and assessments including a detailed multi-stage Sustainability Appraisal process. Further detail on the selection of

the preferred strategy, consideration of alternatives and the process of Sustainability Appraisal is included in the responses to Questions 1.3 and 1.4.

2.5.3 Given the needs and opportunities for residential and employment development established through the Council's evidence base, all reasonable strategies for the long term sustainable development of Knowsley involve some element of development within the Green Belt. As set out in the Duty to Cooperate Statement (SD14) no deliverable strategy has been identified whereby these needs would be met in any nearby district. If the Council did not pursue a strategy of Green Belt release through its Local Plan, the required level of housing and employment development would not be delivered over the plan period in Knowsley, meaning objectively assessed needs for this type of development would not be met. This strategy would not be sound in terms of national planning policy, and would fail to meet the strategic objectives for the development of the Borough.

2.6 Why is there no specific mention in policies CS 1 or 2 of fundamental principles such as meeting the housing and employment needs of the borough, or minimising the loss of Green Belt land? Should policy CS 2 ensure that the development principles also apply to the preparation of subsequent stages of the Local Plan as well as to individual development proposals?

2.6.1 Policies CS1 to CS8 have been drafted as a complementary set to be read in conjunction with each other. For example policies CS3 and CS4 cover housing and employment needs respectively, while policy CS5 covers Green Belt issues. However, the Council would be happy to add text to paragraphs 5.1 and 5.2 to further explain the relationship between these policies.

2.6.2 Alternatively, Policy CS1 (clause 1) or CS2 (principle 1) could be modified to confirm that meeting housing and employment needs do form fundamental considerations. Policy CS2 (principle 4) could be modified to stress that loss of Green Belt land outside the "reserve" and "safeguarded" locations should be minimised. This could also strengthen the Plan by discouraging speculative development outside these locations. Whilst these are not fundamental soundness issues these modifications could help assist the interpretation of the Plan.

2.6.3 Paragraph 5.2 of the KLPCS explains that policies CS1 to CS8 will underpin other policies including those in the KLPCS and in other Local Plan documents. The Council therefore intends to apply the principles outlined in Policy CS2 when preparing subsequent Local Plan documents as well as when making decisions on specific development proposals. However, whilst this is not a fundamental soundness issue the Council recognises that policy CS2 principle 1 could be modified to help clarify that this will be the case.

Potential Main Modification*

Amend Policy CS2 clause 1 to read:

“New development in Knowsley and the preparation of subsequent stages of the Local Plan will be expected to support the following development principles: [...]”

2.7 What provision has been made in the KLPCS and associated documents for alternative strategies to be implemented if development does not come forward as envisaged? Do the policies include sufficient flexibility and contingencies to take account of unexpected changes in circumstances?

- 2.7.1 The KLPCS contains significant flexibility (as required by the NPPF) to allow for different development scenarios and unexpected circumstances, while seeking to deliver its central vision and objectives. This approach will minimise or delay any likely need for future review taking account of the different economic, social, and environmental conditions which could prevail over the period to 2028.
- 2.7.2 As described in the Council's statement on matter 11 the KLPCS will be subject to regular monitoring which may result in policies being reviewed, amended or replaced. This would need to be undertaken as part of a partial review or new Local Plan preparation, and so would be subject to consultation, Sustainability Appraisal and other assessments, and scrutiny through an Examination in Public. However the KLPCS contains sufficient levels of flexibility and contingency measures to cope with changing circumstances as described for some of the key areas of the Plan below.
- 2.7.3 Housing delivery: The housing target in Policy CS3 is to be achieved over the plan period, recognising that housing delivery rates are unlikely to be constant. If delivery does not meet the annual average in the policy, then the shortfall will be factored into the remaining plan period (see response to Question 3.13 for further information). Policy CS3 sets an indicative (rather than prescriptive) distribution of new housing to different settlements, which would not unnecessarily restrict the ability of new homes to be delivered in all of Knowsley's township areas. Policy CS3 also provides flexibility in relation to housing sizes, tenures and density by requiring developers to demonstrate broad compliance with up to date evidence, rather than taking a highly prescriptive approach.
- 2.7.4 Flexibility is also built into the trigger mechanism for release of Green Belt land to meet housing needs, with the timescale for this being based on delivery achieved, rather than through prescription of a specific date for release in the KLPCS. The KLPCS identifies sufficient “headroom” land capacity for residential development (from sites in the urban area and Green Belt) to meet housing needs beyond the end of the plan period and account for the unlikely scenario that some sites may not come forward as anticipated.

Table 5.2 of the KLPCS demonstrates that whereas the shortfall in urban land supply between 2010/11 and 2027/28 to meet the plan period target is 1,812 dwellings the total capacity of sites being brought forward from the Green Belt is 3,258 dwellings. This approach recognises the risks of limiting land availability to only that needed to meet targets within the plan period and will improve the range of size, type and location of housing sites available in Knowsley.

2.7.5 Employment: The employment land target in policy CS4 is considered achievable over the plan period based upon long term historic trends, and will ensure that a suitable range and choice of sites and appropriate quantity is available to meet demand during the plan period and beyond. As demonstrated in table 5.2 of the KLPCS a “headroom” surplus within the supply has been introduced to provide flexibility to react to circumstances such as the need to replace losses of supply to other uses and meet the needs of new and emerging employment sectors. This “headroom” will be delivered via the identification of ‘reserve’ sites to be removed from the Green Belt. This approach will provide appropriate flexibility to ensure requirements for employment land up to 2028 and beyond are met whilst limiting the release of Green Belt land to the minimum required and to the most sustainable sites.

2.7.6 Viability and deliverability: The Council recognises that development viability for selected types of development in some areas of Knowsley represents a challenge. The Council's approach will ensure that obligations set out in the KLPCS policies do not threaten development viability. The KLPCS is based on comprehensive evidence in the Economic Viability Assessment (EB06) regarding the potential costs to developers of policy implementation. Policy CS27 (clause 5 and 6) and other policies such as CS15 ("Delivering Affordable Housing") set out that the most substantial policy burdens may be potentially relaxed for specific schemes provided relevant and robust evidence is submitted with a planning application. This flexibility will facilitate the delivery of new development in Knowsley.

***Note regarding modifications process**

The suggested potential modifications to the KLPCS set out in this statement are put forward to assist the consideration of this matter at the hearing sessions. These and any other potential modifications would need to be approved by the Council's Cabinet and undergo formal public consultation before being considered for inclusion in any version of the KLPCS which is finally adopted.