

KNOWSLEY LOCAL PLAN: CORE STRATEGY

KNOWSLEY METROPOLITAN BOROUGH COUNCIL

HEARING STATEMENT 3A

Matter 3 HOUSING PROVISION

Issue 1: Whether the proposed amount of housing development meets the objectively assessed needs of the borough.

Questions

3.1 Has the Strategic Housing Market Assessment (SHMA) been prepared in accordance with current guidance? Why does the SHMA relate to only part of the housing market area? The SHMA refers to the need for a full update by 2012 – why has this not been carried out?

3.1.1 The Knowsley Strategic Housing Market Assessment (SHMA) (EB04) was produced in 2010. The Housing Market Update (SD24) provides an update on key information in the SHMA including secondary data covering matters such as population, households, projections, housing stock and market indicators. Together these documents represent the Council's most up-to-date SHMA.

3.1.2 The SHMA was prepared in accordance with current best practice guidance, namely Strategic Housing Market Assessments Practice Guidance, Version 2 (CLG, 2007). The Housing Market Update has also had regard to this. Table 2-1 of the SHMA (page 25 (EB04)) and figure 2.1 of the Housing Market Update (page 5 (SD24)) describe how the guidance has been met.

3.1.3 CLG is currently consulting on revised practice guidance which will replace the 2007 guidance. Until this process is completed the 2007 guidance should still be regarded as extant.

3.1.4 The NPPF (paragraph 159, pages 38-39 (PG01)) advises that local authorities should prepare SHMAs to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. To meet this requirement, Knowsley's housing market is considered part of the "northern" housing market area within the Liverpool City Region, as originally defined in the Liverpool City Region Housing Strategy (PG28). The SHMA (paragraph 3.8.3, page 50 (EB04)) confirms this and states that the Borough of Knowsley cannot be classed as a single market area. The SHMA and the Housing Position Statement (EB04 and SD22) both focus on information available for Knowsley, with reference to the wider strategic housing market area.

3.1.5 It is proposed that a new SHMA be prepared on a sub-regional basis, working in partnership with those Liverpool City Region authorities which fall wholly or partly within the same housing market area as Knowsley (including Liverpool,

Sefton, Wirral, St.Helens, West Lancashire and Halton). The timing of this work is dependent on agreement by these authorities. It may also be necessary to involve authorities such as Warrington (which lies in a neighbouring strategic housing market area) due to the overlaps which exist with the Liverpool City Region "north" housing market area.

- 3.1.6 Consideration of the likely timing of a sub-regional SHMA has centred on the implications for the timetables for preparation of the Local Plans of individual authorities. In general, those authorities with Plans which have been recently adopted and/or passed their Examination in public stage (which include Halton, St.Helens and West Lancashire) have less immediate need to undertake this work. Notwithstanding these timing issues, senior planning officers from the Liverpool City Region have endorsed the principle of undertaking a sub-regional SHMA in 2015/16. It is considered likely that this or a similar timetable will be adhered to given the clear requirement set by the NPPF to undertake this work.
- 3.1.7 Whilst it would have been preferable for this work to have been completed prior to submission of the KLPCS, the Council does not consider this to be a critical soundness issue given the wide range of other evidence which exists concerning the demographic and housing market characteristics of Knowsley and the wider City Region. The Housing Market Update (chapter 4, pages 14-20 (SD24)) sets out a range of updated information regarding Knowsley's relationship to the Liverpool City Region housing market.
- 3.1.8 As mentioned in paragraph 3.1.3 above, the Government is currently reviewing the guidance associated with the preparation of SHMAs, as set out in the External Review of Government Practice Guidance (Lord Taylor/CLG, 2012). The Council welcomes this review and considers it appropriate that the aforementioned commission of a SHMA with sub-regional coverage be delayed until the Government has confirmed its revisions to the relevant practice guidance. This will enable the sub-regional study to have sufficient longevity to support Local Plans in the longer term. This review of guidance is expected to be concluded in 2014.
- 3.1.9 The Council also notes the government's intention to publish updated sub-national population and household projection figures, through the ONS and CLG respectively, in 2014. The population projections are expected to be published around April 2014, with the household projections following later in the year, although this has not been confirmed. The datasets will update the interim 2011-based projections and will cover a longer time period (likely to be around 25 years from base date). This will provide key evidence for a sub-regional SHMA, and therefore it is appropriate that such a commission is undertaken after this data has been made available.
- 3.2 What are the full objectively assessed needs for market and affordable housing for the borough, and how have they been derived? Does the evidence base give a clear understanding of these needs – can the major differences between the SHMA and recent population and**

household projections be reconciled? Should the Regional Spatial Strategy backlog since 2003 be included?

3.2.1 There are a number of potential methods by which needs for market and affordable housing can be objectively assessed. These methods are summarised in the Technical Report: Planning for Housing Growth (TR01), including: CLG sub-national household projections, the findings of the SHMA, assessments of performance against previous targets, and also a range of methods introduced through initial work published in 2010 connected to a proposed review of the North West Regional Strategy. The Technical Report (chapter 7, pages 119-128 (TR01)) explains how these methods produce a range of potential needs-based targets for housing growth in Knowsley. It also sets out for illustrative purposes how the methods compare for example with historic build rates in Knowsley. The following paragraphs summarise some key elements of this evidence.

Household Projections

3.2.2 The NPPF (paragraph 159, bullet 1) advises that in assessing housing needs significant weight needs to be given to the latest CLG sub-national household projections. The Council considers that these form an important "starting point" although the weight to be attributed to them needs to be moderated with reference to the fact that they are predominantly trends-based and also to the evidence of significant un-met needs and historic under-delivery (which can affect the projections) in Knowsley.

3.2.3 The latest CLG sub-national household projections for Knowsley are those based on the 2011 Census outputs which were published by the Office for National Statistics (ONS) in April 2013. These have been published on an interim basis and only cover the period from 2011 until 2021. They are therefore subject to future review and updating by ONS, as discussed in response to Question 3.1 of this Statement. They therefore do not cover the full Plan period from 2010/11 to 2027/28. They project a total household growth of 2,400 at an average annual rate of 241 per annum between 2011 and 2021. In the absence of longer term projections, if the average rate was projected further forward over the whole Plan period they would give an overall figure of 4,388 additional households over the period 2010/11 to 2027/28. The Council notes that the extrapolation of interim household projections over a longer period should not necessarily be considered to be a reliable long term projection.

3.2.4 The Council considers that translating the latest household projections directly to a housing target would be inadequate to meet its housing needs over this period. This is due to the likely significant influence of past under delivery on the figures. Furthermore the figure would be insufficient to enable significant inroads to be made into the evidenced need for additional market sector housing and affordable housing in Knowsley. The household projections do however provide an important "reality check" when assessing the weight to be attributed to the very high figures arising from the SHMA (see below).

3.2.5 The 2011-based household growth projection is significantly lower than those published previously by CLG for Knowsley, including the 2008-based projections of an annual average increase of 360 new households per annum (6,480 dwellings between 2010/11 and 2027/28) which were the latest available projections when the KLPCS was published for consultation at the end of 2012. The 2008-based projections are also the most recently published by CLG which provide figures to cover the whole plan period. Further detail regarding the differences between historic sets of household projections is given in the Technical Report (paragraph 4.3.30 and Figure 4.14, page 57-59 (TR01)). This again illustrates the shortcomings of relying on the 2011-based interim household projections for the longer term.

Strategic Housing Market Assessment

3.2.6 The SHMA sets out in summary in Chapter 1 (paragraph 1.11.10, page 17 (EB04)) the figures for the amount of market housing demand, and affordable housing needs in Knowsley, which were derived using the CLG Needs Assessment Model. If averaged out over the full Plan period, these give a total requirement of 18,864 dwellings (or an average of 1,048 per annum). This reflects the situation in other authorities, where SHMAs using the CLG Model have recorded housing needs significantly in excess of sub-national household projections.

3.2.7 Although the SHMA appears to have applied the CLG Needs Assessment Model correctly, limited weight can be given to the figures derived for the purposes of setting a housing target in the KLPCS. The reasons for this are set out in the Housing Technical Report (Section 9.9, page 149-154 (TR01)). It should also be noted that:

- The figure is over four times the most recent household projections (see above); and
- The SHMA itself implies that the figures were not intended to replace the Plan period targets which were at that time derived from the Regional Spatial Strategy (section 14.4, page 179-181 (EB04)).

3.2.8 The Council does not consider that the housing needs and demands findings arising from the SHMA can be readily reconciled with the latest household projections, given the scale of difference between the two. However whilst giving limited weight to the very high figures arising from the SHMA, the document demonstrates evidence of significant unmet needs and demands in Knowsley, including accounting for under-delivery of housing in the recent past. This helps to confirm that an approach based solely on the 2011-based interim household projections would be inappropriate. The Council considers that the realistic need for new housing lies between these two extreme scenarios.

RS 2010 runs prepared by 4NW

3.2.9 In 2010, 4NW (the Regional Leaders' Board and the body which had previously prepared the Regional Spatial Strategy or "RSS") was preparing a review of RSS. On the basis of economic scenarios and other evidence they

published initial technical work. This set out a range of housing figures for the region as a whole which were disaggregated to each district using a number of methodologies (or "runs"). These were based on a variety of information including in some cases distribution of predicted job growth and are described in Section 7.9 and Appendix 1 of the Technical Report (page 125 and page 176-178 (TR01)).

- 3.2.10 The runs (I to P) as shown in the Housing Technical Report (table 7.3, page 126 (TR01)) indicated that an annual housing requirement for Knowsley would be likely to fall between 413 dwellings per annum (in the case of run L) and 582 dwellings per annum (in the case of run O). These runs were based on longer term time periods of 2006-2030 and therefore, for the purposes of the Housing Technical Report, were extrapolated as annual averages for the period 2010/11-2027/28. The weight that can be attributed to these runs is reduced by the fact that they constituted initial work only and that RS2010 did not reach its examination in public stage before the process was halted following the change of Government. Nevertheless, the Council considers that they do help to narrow the range within which a realistic housing requirement figure for Knowsley is likely to fall. Prior to their abolition, 4NW made this work available specifically for the purposes of informing local development plans (see AD01 and AD02).

Treatment of RSS backlog

- 3.2.11 The North West Plan: Regional Spatial Strategy to 2021 (PG18) was revoked in May 2013. It is no longer part of the development plan for Knowsley. However, assessing the performance against previous targets can be considered as a proxy estimation of housing requirements which have not been met in recent years. In the Technical Report (table 7.1, page 122 (TR01)), the Council has calculated the nominal "backlog" figure for Knowsley's performance against the RSS target for the period which it applied, i.e. 2003/04–2009/10. The approach to reconciling this nominal "backlog" is explained within the Technical Report (paragraph 9.9.3, pages 150-151 (TR01)). Whilst it is not considered to be appropriate that the "backlog" be added as an uplift to the housing target proposed in the KLPCS, the Council does consider that the existence of this backlog provides further evidence justifying an approach which does not rely solely on the 2011-based interim household projections translated as a housing target; there is evidentially unmet need which requires a higher target to be set.
- 3.2.12 Further detailed discussion regarding housing needs assessments is set out in the Technical Report (section 9 (TR01)).

Conclusions

- 3.2.13 Given the wide ranging evidence, the Council is confident that setting the target stated for housing growth within the KLPCS is a practical method by which the differences between the needs assessment scenarios can be reconciled, in a manner which also provides a deliverable strategy for the Borough. The target exceeds the latest household projections, and ensures

that a realistic level of accrued needs and demands can be met. Following the Council's balanced assessment, it is considered that this will perform more effectively than any alternative approach in meeting assessed needs in the way required by the NPPF.

3.3 What level of population growth is envisaged by 2028 as a result of the planned 8,100 dwellings? Is this consistent with the overarching objective of population stabilisation? What is the scale of population growth by 2028 in terms of natural change and net migration? What level of new housing would be required to achieve a balance between in- and out-migration over the plan period (zero net migration)?

Estimated population growth due to planned housing growth

- 3.3.1 It is difficult to predict population change attributable to housing growth accurately. This is because the number of persons occupying new dwellings will vary depending on their size, type and occupancy levels. It is also difficult to predict whether households occupying new dwellings will have moved from other properties in Knowsley or have migrated to the Borough from elsewhere. A proportion of new dwellings are likely to be occupied by existing Knowsley residents, including those currently in concealed households, or additional households created from household separation, and households already occupying dwellings in the Borough.
- 3.3.2 Notwithstanding the above, there are some general proxies which can be used to estimate the level of population growth arising from the availability of new housing. CLG provides estimates of average household sizes in its sub-national household projections, the latest of which applying to Knowsley are set out in the Technical Report (figure 4.8, page 53 (TR01)). These project that household sizes will decline between 2011 and 2021. Assuming that this decline will continue at a steady rate (as per the second scenario in figure 4.8, as above), it is estimated that there will be approximately 2.29 persons per household in Knowsley by 2028. If an additional 8,100 dwellings are delivered in Knowsley between 2010/11 and 2027/28, and a percentage of vacancy of 4% to represent market churn is added, this would result in 7,776 dwellings being occupied. Adding this to existing households, the total number of households in Knowsley would reach 69,476 by 2027/28¹. Again assuming that all of these households contain the average number of persons (i.e. 2.29 persons per household), this calculation would result in an estimated population of 159,100 for Knowsley by 2027/28.
- 3.3.3 Given the level of assumptions within it, this calculation is likely to be artificially high and should not be treated as a reliable prediction. Keeping this caveat in mind, it is estimated that the population attributable to housing growth could in theory represent an uplift on population levels in Knowsley, which would be consistent with the Council's aim to stabilise population levels

¹ This calculation is based on adding 8,100 households, with a 4% vacancy rate, so 7,776 households, to the levels estimated for 2010 by CLG, of 61,700 households in Knowsley. This data is replicated in the Housing Market Update (SD24, figure 6.6, page 37).

in the Borough and assist with reversing the population loss experienced between 2001 and 2011, which was accompanied by lower housing targets and housing restraint policies over this period.

Population growth due to natural change and net migration

- 3.3.4 As noted in the Council's evidence base (TR01 and SD24), the latest ONS sub-national population projections (2011-based) are interim, running from 2011 to 2021 only, in contrast to full projections which cover a 25 year period. This means that there is no up-to-date population projection from a national source covering the period between 2021 and 2028, to enable a view on population change, migration and natural change over this period to be taken. It is possible to extrapolate the trends projected for the interim period over a longer period to 2028, the results of which are set out in paragraph 3.3.5 below, but this exercise lacks the robustness of the full ONS population projections. These projections also do not account for the expected impacts of housing growth policies over the period.
- 3.3.5 Appendix 1 of this statement sets out the Council's approach to extrapolation of interim population projection data. Between 2011 and 2028, due to net migration, the population in Knowsley is projected to have declined by 4,500 persons. Due to natural change, the population is projected to have grown over the same period by 8,600. This means that the population overall would be expected to grow by 4,100 persons to a level of 150,000 persons.
- 3.3.6 Assuming (as per paragraph 3.3.2 of this Statement) that the average household size in Knowsley would be 2.29 persons by household by 2028, the number of new dwellings required to achieve zero net migration between 2011 and 2028 would be 1,965 dwellings². This makes the significant assumption that all dwellings would be occupied by those who would have otherwise migrated from the Borough, which is unlikely to be the case. The Council does not consider it appropriate to plan for housing growth to accommodate only this proportion of the population, given stated evidence for meeting the housing needs of newly arising households in Knowsley (for example from concealed households or separated households) and balancing the Borough's housing market to provide additional choice and range of housing options. In addition, the Council acknowledges that given the shared nature of the housing market across the Liverpool City Region, it would not be practicable to plan only for Knowsley residents occupying new homes, when these may also be occupied by households originating from neighbouring authority areas.
- 3.4 Have employment factors been taken into account in determining the scale of housing need? In broad terms is the planned scale of new housing in balance with the anticipated growth in jobs? If not, what are the consequences for patterns of commuting?**

² This calculation is based on the assumption that the net migration between 2011 and 2028 is -4,500 persons and a household size of 2.29 persons per household at this point.

- 3.4.1 When planning for both housing and employment growth, the Council has highlighted that Knowsley's housing and labour markets are closely interlinked with those in the wider Liverpool City Region, as evidenced in the Technical Report: Planning for Housing Growth (TR01), Technical Report: Planning for Employment Growth (TR02), and the Housing Market Update (SD24). Knowsley's residential areas are well connected to employment opportunities across the sub-region, by existing highways and public transport networks, and the contiguous nature of townships with surrounding settlements. Given its spatial placement within the Liverpool City Region, it can not be reasonably assumed that all Knowsley residents will also be employed in Knowsley. As a major regional centre with a significant employment base in the city centre and other areas, Liverpool will remain a prominent employment destination for Knowsley residents. As an example, for residents of Halewood, strategic employment areas in neighbouring Halton (e.g. 3MG) and Liverpool (e.g. Speke Boulevard area) will continue to be closer than some of those elsewhere in Knowsley. In addition, due to their large scale and strategic nature, a significant proportion of job opportunities in Knowsley (e.g. at Whiston Hospital, the Jaguar Land Rover complex, and Knowsley Industrial and Business Parks) will continue to be taken up by those living in neighbouring districts and beyond. It is therefore inappropriate to consider Knowsley, or any of its township areas, in isolation in terms of commuting.
- 3.4.2 Notwithstanding this, in planning for housing growth the Council has considered scenarios based on evidence of potential future job distribution. In the Housing Technical Report (paragraph 7.9.1, page 125 and Appendix 1, page 176-178 (TR01)), the Council introduced several scenarios for housing growth which were based on calculations undertaken as part of the preparatory work for the Regional Strategy, which was eventually abandoned (see documents AD01 and AD02). These were runs K, N and P, whose annual averages resulted in scenarios of 8,388 dwellings, 9,216 dwellings and 10,350 dwellings respectively, required to be delivered between 2010/11 and 2027/28 (based on annual average rates extrapolated over the appropriate period). These scenarios all resulted in targets of a similar size to that promoted in the KLPCS, demonstrating the appropriateness of proceeding with the chosen approach with reference to the available evidence. These scenarios also estimated that between 44 and 266 jobs would be created per annum on average in Knowsley.
- 3.4.3 Whilst noting the interconnectedness of the Knowsley labour and housing markets with the wider Liverpool City Region, it remains appropriate to consider the extent to which new jobs are expected to be created in Knowsley through the policies of the Local Plan. As set out in Policy CS4, the KLPCS plans for 183.5 hectares of new employment land between 2010/11 and 2027/28, which will provide new employment opportunities in the Borough. There is also significant potential for re-use of vacant premises in Knowsley's existing employment areas, which will also contribute towards provision of new jobs. Appendix 2 of this Statement sets out how the land and premises available and being promoted for development through the KLPCS has been translated to an estimated number of jobs. This includes assumptions based on plot ratios (how much of available land would be occupied by functional

floorspace) and job densities (the floorspace required per job, depending on the function of the development).

- 3.4.4 The results of these assumptions are that an estimated 11,390³ jobs could be created by 2028 if 183.5 hectares of employment land is developed by 2028 for employment purposes. Up to an additional 3,090 jobs could be created if all existing vacancy within employment areas at April 2013 were reduced to 7.5%, noting that the Joint Employment Land and Premises Study (EBO7) suggests that market equilibrium is achieved at this level (pg.79). The Council considers that vacancy within existing stock is likely to stabilise towards these levels by April 2014 which will facilitate increased churn and demand for land for employment uses. A degree of caution is however required in considering the job calculation figures in the context of population growth, given they are based upon assumptions and forecasts, together with a gross employment land take up figure which potentially overestimates the actual net additional jobs that would be created. Employment requirements and vacancy levels are considered further in the Council's response to Matter 4.
- 3.4.5 This scale of job growth planned for in the KLPCS broadly accords with the population growth which is estimated to result from the Plan's housing policies. The response to Question 3.3 of this Statement estimates that Knowsley's population at 2028 would be approximately 159,842, if all dwellings planned are fully occupied, and all households are occupied to the estimated average level. Utilising the 2011-based sub-national population projections, Appendix 1 of this statement estimates that by 2028 about three fifths of Knowsley's population will be of working age (i.e. aged 16-64)⁴. Applying this age structure to the population attributable to housing growth, this indicates that Knowsley could have a working age population of almost 96,000 by 2028. This is an increase of 1,800 persons over the figure of 94,200 persons of working age in 2011. Clearly this is significantly less than the 11,390 jobs which would be created in Knowsley by 2028 if all employment land is developed, although caution is required in drawing such a conclusion given the potential overestimation of jobs growth previously mentioned.
- 3.4.6 A further factor to be considered is that the Knowsley working age population demonstrates significant unemployment at present, which this level of additional employment opportunities would assist in addressing. There may also be a significant opportunity for Knowsley to provide jobs for more residents living in surrounding areas than at present, bearing in mind the linked nature of labour markets across the sub-region (paragraph 3.4.1 of this Statement). However, the Council does not consider this to be a significant issue with regard to impacts on infrastructure, given the contiguous nature of the urban areas of Knowsley with surrounding districts, and existing patterns of commuting. On the basis of the available evidence, the Council considers

³ Based upon 62 jobs per hectare average calculated from forecasts within Appendix 2.

⁴ This assumes that as present, the working age population covers those aged 16-64 inclusive. There is potential that over the plan period to 2028, the upper limit of this age group could be changed. However, given the lack of certainty around this at present, the existing category has been applied.

that the chosen approach would not adversely affect the ability of residents of Knowsley or neighbouring districts to access jobs in the Borough.

3.5 What exactly is the reasoning behind the selection of the 8,100 dwellings target? If it is **not based on fully meeting objectively assessed needs:**

- (a) should the dwelling target be increased to meet the assessed needs?**
- (b) or alternatively, has the scope for neighbouring authorities in the housing market area to accommodate all or part of the unmet needs been fully explored?**
- (c) or alternatively, are there compelling local circumstances which justify lower levels of provision? In particular, is there credible evidence of constraints on environmental and/or infrastructure capacity grounds to warrant lower levels of growth?**

Selection of dwelling target

- 3.5.1 The Technical Report: Planning for Housing Growth (chapter 9, page 140-156 (TR01)) sets out extensive and detailed justification for the selection of the housing growth target within the KLPCS of 8,100 dwellings between the years 2010/11 and 2027/28 inclusive. This justification is supported by a range of evidence summarised in the Technical Report. The target has also been subject to consultation and statutory assessments. The following paragraphs summarise the Council's position.
- 3.5.2 The Council considers that the target within the KLPCS will deliver sufficient housing to meet objectively assessed housing needs in Knowsley (which are explained in response to question 3.2 in this Statement). This view is supported by the fact that the annual average target proposed (450 net dwelling completions per annum) is almost double the underlying rate of household growth which is set out in the 2011-based interim sub-national household projections. This is important given that NPPF (paragraph 159) gives significant weight to the household projections as forming the starting point in assessing housing needs. The figure of 450 completions per annum also exceeds any of the average annual increases attributable to the previously published household projections for Knowsley set out in the Technical Report (figure 4.14, page 59 (TR01)). The figure is comfortably within the range of scenarios arising from the work undertaken by 4NW in 2010. Notwithstanding the significantly higher figures presented in the SHMA (EB04), the Council considers there to be no convincing evidence that stating an alternative figure for "objectively assessed need" would be more appropriate or improve the soundness of the Plan.
- 3.5.3 If the housing growth target was increased significantly, this would have major implications for the KLPCS as it is likely that the flexibility within the spatial strategy would be exhausted, and the Plan would need to be altered to accommodate further locations for housing growth. In the Council's view there are no compelling grounds to increase the dwellings target proposed, as the target is sufficiently large to deliver housing which would meet objectively

assessed housing needs in Knowsley over the plan period. In addition, the Council considers that it would be difficult to prove that a target in excess of 8,100 dwellings would be deliverable over the plan period, and hence the effectiveness and realism of the policy would be called into question.

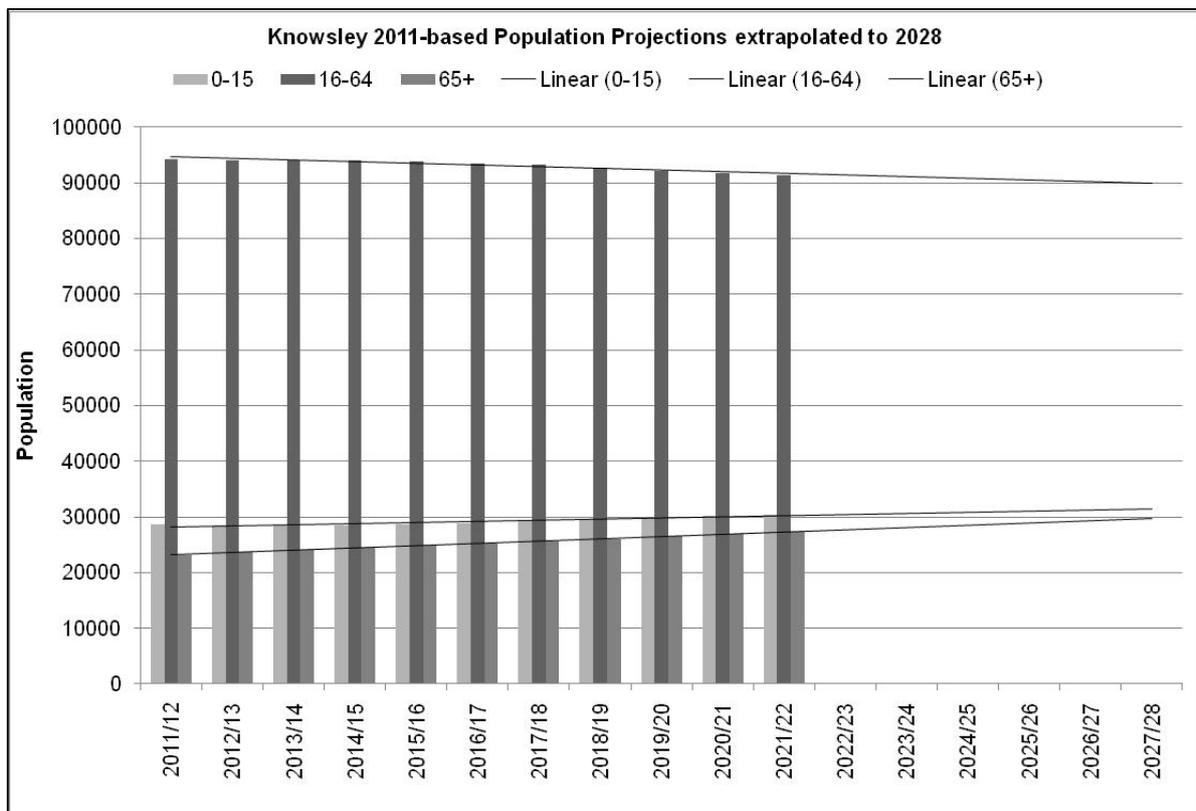
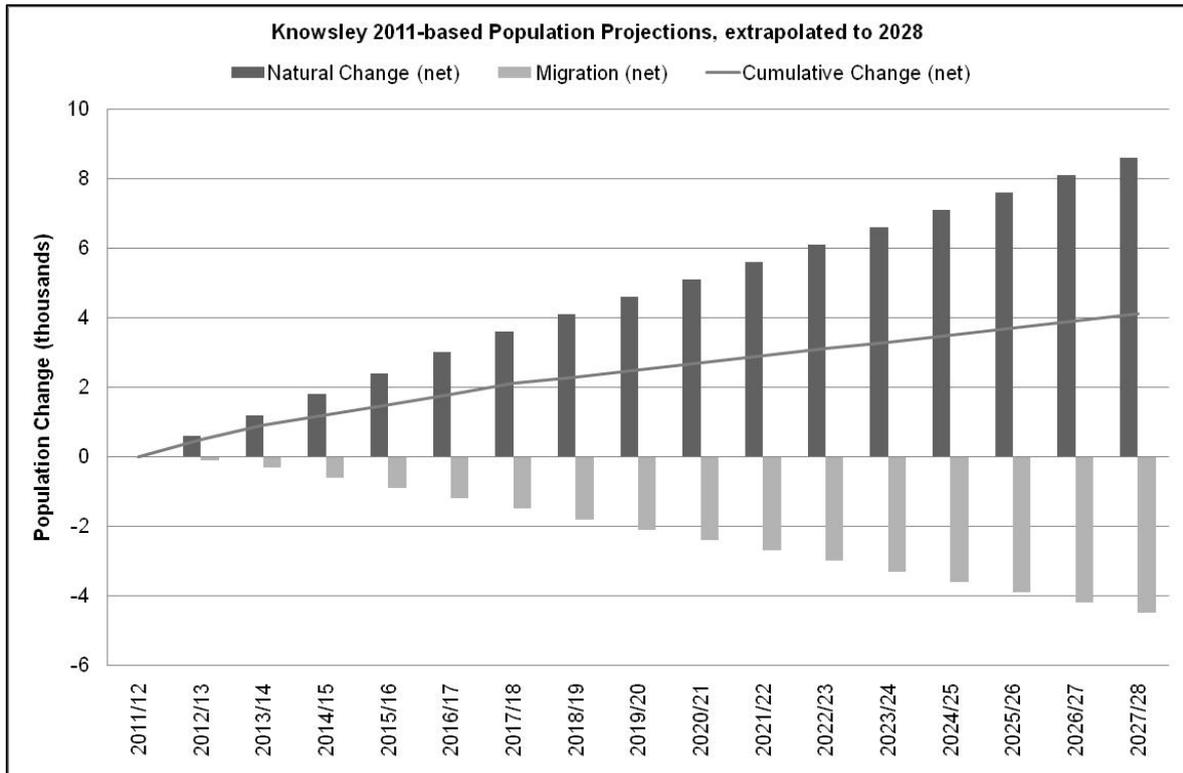
- 3.5.4 If the stated target was appreciably decreased, it would also be necessary to re-assess the appropriateness of the spatial strategy. Decreasing the dwellings target from the proposed level would lessen ability to deliver housing which would meet the full range of housing needs over the plan period. This would be contrary to the strategic objectives of the plan and the emphasis on housing growth in the NPPF. This would jeopardise the soundness of the KLPCS as it would call into question whether it has been positively prepared.

Accommodating the dwelling target

- 3.5.5 The Council has considered in detail the extent to which the target can be practically accommodated on land in Knowsley. As demonstrated in the Council's Statement 3C this process has included identifying locations in the Borough's existing urban area which are suitable for new residential development and the timescales within which they are expected to come forward.
- 3.5.6 This process also considered the extent to which Green Belt land in Knowsley can sustainably accommodate new residential development, as set out within the Green Belt Study (EB08) and the Technical Report: Green Belt (TR03). The Council's Statement 5A includes further detail on this process.
- 3.5.7 Since this robust assessment has been undertaken, the Council does not believe that there are any compelling grounds in relation to environmental constraint or infrastructure capacity which would merit a reduction in the housing target. Every effort has been taken to ensure that the deliverability of the KLPCS policies in relation to housing growth can be fully evidenced.
- 3.5.8 As the Council considers the figure of 8,100 dwellings up to 2028 to be a realistic and balanced assessment of needs having regard to all the evidence and it has demonstrated that such a target can be delivered in Knowsley, it has not been necessary for the Council to formally request that any neighbouring district accommodate any proportion of its needs. Despite this, detailed consideration has been given to the potential ability of neighbouring authorities to accommodate Knowsley's needs, and vice-versa, on a sub-regional basis. This issue was investigated at length in the Liverpool City Region Housing and Economic Development Evidence Base Overview Study (LC03), the Final Duty to Cooperate Statement (SD14) and the aforementioned Technical Report (TR01). These studies concluded that there is no evidence that any of Knowsley's housing requirements should be accommodated within neighbouring authorities or that there was, in any event, a proven ability of neighbouring districts to accommodate these needs in addition to their own within the timescales required. Neither was it proven to be appropriate that Knowsley accommodate any neighbouring authority

housing needs. All neighbouring authorities have noted their support for the Duty to Cooperate Statement (SD14), which clearly states this position.

Appendix 1: Knowsley 2011-based Population Projections



Source: CLG sub-national interim household projections 2011 – 2021 (CLG, 2013)

Appendix 2: Job Yields from Employment Locations in Knowsley

Site Name	Area	Site Size (ha)	Plot Ratio Assumption (% rounded)	Gross Floorspace (GIA - sq.m)	Gross to Net Ratio (%)	Employment Density Assumption (sq.m per FTE rounded)	Estimated Job Yield (FTE)	Data Source / Methodology
Ford Jaguar Land Rover Expansion Area, Speke Boulevard	Halewood	16.47	35	57645	85	61	803	RTP/4NW
Jaguar Land Rover Fringe, between North Road & South Road, Halewood	Halewood	8.65	35	30275	85	61	422	RTP/4NW
Pentagon East Expansion, Wood Road, Halewood	Halewood	1.04	35	3640	85	61	51	RTP/4NW
Eli Lilly Expansion Land, Fleming Road, Halewood	Halewood	0.79	35	2765	85	61	39	RTP/4NW
Esselte Ltd, Wilson Road, Huyton, L36 6HQ	Huyton	0.84	35	2940	80	45	52	RTP/4NW
Land Adjacent To Railway House, Hale View Road, Huyton	Huyton	0.07	23	159	70	16	7	RTP/4NW
Land Between And Including Units 1-9 Interchange Motorway Estate, Wilson Road, Huyton	Huyton	0.98	35	3430	85	61	48	RTP/4NW
Interchange Motorway Estate, Wilson Road, Huyton, Knowsley	Huyton	0.75	23	1724	85	61	24	Planning Permission & RTP/4NW
Land Between Cronton Road And M62 Motorway (Junction 6)	Huyton	8.03	35	28394	80	24	939	Planning Permission
Hi-Wire Ltd (Essex International), Ellis Ashton Street, Huyton, Knowsley, L36 6BW	Huyton	2.35	35	8225	85	61	115	RTP/4NW
Land at junction of Wilson Road & Brickfields, Huyton Business Park	Huyton	0.57	35	1995	85	61	28	RTP/4NW
Land adjacent to BASF Coatings & Inks Ltd, Ellis Ashton Street, Huyton Business Park	Huyton	0.90	35	3150	85	61	44	RTP/4NW
Land Fronting D Evans Electrical, Huyton Business Park, Wilson Road	Huyton	0.22	35	770	85	61	11	RTP/4NW
Land at Knowsley Lane, Huyton	Huyton	21.35	35	74725	80	45	1328	RTP/4NW
Land off Wilson Road, Huyton Business Park	Huyton	0.67	35	2345	85	61	33	RTP/4NW
Part of Dairy Crest / Kraft site, A580, Knowsley Industrial Park	Kirkby	3.97	35	13895	85	61	194	RTP/4NW

Site Name	Area	Site Size (ha)	Plot Ratio Assumption (% rounded)	Gross Floorspace (GIA - sq.m)	Gross to Net Ratio (%)	Employment Density Assumption (sq.m per FTE rounded)	Estimated Job Yield (FTE)	Data Source / Methodology
Moss End Way (West), Knowsley Industrial Park	Kirkby	4.14	35	14490	85	61	202	RTP/4NW
Moss End Way (East), Knowsley Industrial Park	Kirkby	2.09	35	7315	85	61	102	RTP/4NW
Land at Marl Road / Woodward Road, Knowsley Industrial Park	Kirkby	0.47	35	1645	85	61	23	RTP/4NW
Junction Of Gores Road / Acornfield Road, Knowsley Industrial Park	Kirkby	0.75	35	2625	80	45	47	RTP/4NW
North Perimeter Road / Moss End Way, Knowsley Industrial Park	Kirkby	5.31	35	18585	85	61	259	RTP/4NW
Land at corner of A580 / Moorgate Lane, Knowsley Industrial Park	Kirkby	3.27	35	11445	80	45	203	RTP/4NW
Land north of Image Business Park, Acornfield Road, Knowsley Industrial Park	Kirkby	3.41	35	11935	80	45	212	RTP/4NW
Black Jack, Hornhouse Lane, Knowsley Industrial Park	Kirkby	2.98	35	10430	80	45	185	RTP/4NW
Alchemy, Located Off East Lancashire Road, Kirkby	Kirkby	8.38	35	29330	80	45	521	Planning Permission & RTP/4NW
Land at Academy Business Park, Knowsley Industrial Park	Kirkby	1.48	35	5180	80	45	92	RTP/4NW
Land To Rear Of Delphi Delco, At Junction Of South Boundary Road/Hornhouse Lane, Knowsley Industrial Park	Kirkby	1.93	35	6755	80	45	120	RTP/4NW
Land at Britonwood Industrial Estate, Knowsley Industrial Park	Kirkby	6.36	35	22260	85	61	310	RTP/4NW
Land East Of Moorgate Point, Moorgate Road, Knowsley Industrial Park	Kirkby	2.55	35	8925	80	45	159	RTP/4NW
Vacant Site (Former Rentokil Site), Bradman Road, Knowsley Industrial Park, Kirkby	Kirkby	1.33	35	4655	85	61	65	RTP/4NW

Site Name	Area	Site Size (ha)	Plot Ratio Assumption (% rounded)	Gross Floorspace (GIA - sq.m)	Gross to Net Ratio (%)	Employment Density Assumption (sq.m per FTE rounded)	Estimated Job Yield (FTE)	Data Source / Methodology
Britonwood Yard, off Faraday Road, Knowsley Industrial Park	Kirkby	0.42	35	1470	85	61	20	RTP/4NW
Land at junction of Woodward Road & Acornfield Road, Knowsley Industrial Park, Kirkby	Kirkby	0.34	35	1190	85	61	17	RTP/4NW
Land off Depot Road, Knowsley Industrial Park	Kirkby	0.22	35	770	85	61	11	RTP/4NW
Land off County Road / Arbour Lane, Kirkby	Kirkby	0.62	42	2584	80	78	26	Planning Permission
Academy Business Park, Knowsley Industrial Park, Kirkby	Kirkby	1.91	35	6685	80	45	119	RTP/4NW
Land adjacent to Ambiente House, off Admin Road, Knowsley Industrial Park, Kirkby	Kirkby	0.85	35	2975	85	61	41	RTP/4NW
Land to north of Academy Business Park, Knowsley Industrial Park, Kirkby	Kirkby	0.72	35	2520	85	61	35	RTP/4NW
Syntor Fine Chemicals, Woodward Road, Knowsley Industrial Park	Kirkby	0.58	35	2030	85	61	28	RTP/4NW
Land at Draw Well Road, Knowsley Industrial Park (2 parcels)	Kirkby	0.70	35	2450	85	61	34	RTP/4NW
Land Bounded By Dale Lane, North Perimeter Road & Woodward Road, Knowsley Industrial Park	Kirkby	3.17	35	11095	85	61	155	RTP/4NW
Land opposite 2 Gladeswood Road, off Webber Road, Knowsley Industrial Park	Kirkby	0.50	35	1750	85	61	24	RTP/4NW
Land at Syntor Fine Chemicals, Woodward Road, Knowsley Industrial Park	Kirkby	0.40	35	1400	85	61	20	RTP/4NW
Land At Image Business Park, Acornfield Road, Knowsley Industrial Park	Kirkby	0.24	50	1200	85	61	17	RTP/4NW
Former Council Yard at Depot Road, Knowsley Industrial Park	Kirkby	0.13	35	455	85	61	6	RTP/4NW
I M I Yorkshire Copper Tubing Ltd, East Lancashire Road, Knowsley Industrial Park	Kirkby	3.06	26	8100	80	16	405	Planning Permission & RTP/4NW

Site Name	Area	Site Size (ha)	Plot Ratio Assumption (% rounded)	Gross Floorspace (GIA - sq.m)	Gross to Net Ratio (%)	Employment Density Assumption (sq.m per FTE rounded)	Estimated Job Yield (FTE)	Data Source / Methodology
Project Pluto (Former Petrolite Ltd Site), Acornfield Road, Knowsley Industrial Park	Kirkby	7.66	28	21570	80	24	730	Planning Permission
Knowsley Business Centre and South Boundary Road Hub, Knowsley Industrial Park	Kirkby	2.28	35	7980	80	45	142	RTP/4NW
Fringe of Image Business Park, Knowsley Industrial Park	Kirkby	1.26	35	4410	85	61	61	RTP/4NW
Land to the North of South Boundary Road, Knowsley Industrial Park (3 parcels)	Kirkby	0.53	35	1855	85	45	35	RTP/4NW
Land between Rail Freight Terminal & Former Sonae, off Woodward Road, Knowsley Industrial Park	Kirkby	2.30	35	8050	85	61	112	RTP/4NW
Land to the East of Knowsley Industrial Park	Kirkby	15.75	35	55125	80	45	980	RTP/4NW
Land at QVC site, Knowsley Industrial Park	Kirkby	1.54	35	5390	80	45	96	RTP/4NW
Land adjacent D A M S International, off Acornfield Road, Knowsley Industrial Park, Kirkby	Kirkby	0.93	35	3255	85	61	45	RTP/4NW
Knowsley House, Knowsley Industrial Park	Kirkby	0.45	35	1575	80	45	28	RTP/4NW
Former Snooker Club / Web Complex, South Boundary Road, Knowsley Industrial Park	Kirkby	0.99	35	3465	80	45	62	RTP/4NW
Land adjacent to MTC Northwest, Gores Road, Knowsley Industrial Park, Kirkby	Kirkby	0.32	35	1120	85	61	16	RTP/4NW
Land at the Junction of Cusson Road & Dixon Road, Knowsley Industrial Park	Kirkby	0.43	20	860	70	16	38	RTP/4NW
Land off Acornfield Road, Knowsley Industrial Park	Kirkby	2.77	35	9695	85	61	135	RTP/4NW
Land off Hammond Road, Knowsley Industrial Park	Kirkby	0.87	35	3045	85	61	42	RTP/4NW
Former Sonae (UK) Ltd, Moss Lane, Knowsley Industrial Park, Kirkby	Kirkby	12.62	35	44170	85	61	615	RTP/4NW
Unit 1 & 2 To Rear Of Counterline Ltd, Randles Road, Knowsley Business Park	Prescot / Whiston	0.15	86	1285	85	45	24	Planning Permission
Land Between Units 7 And 19 Randles Road,	Prescot /	1.31	35	4585	85	61	64	RTP/4NW

Site Name	Area	Site Size (ha)	Plot Ratio Assumption (% rounded)	Gross Floorspace (GIA - sq.m)	Gross to Net Ratio (%)	Employment Density Assumption (sq.m per FTE rounded)	Estimated Job Yield (FTE)	Data Source / Methodology
Knowsley Business Park	Whiston							
South Prescott (Area B)	Prescot / Whiston	2.24	35	7840	80	45	139	RTP/4NW
Land at junction of Penrhyn Road / School Lane, Knowsley Business Park	Prescot / Whiston	0.57	35	1995	85	61	28	RTP/4NW
Land At Bens Court, Off Randles Road, Knowsley Business Park	Prescot / Whiston	0.42	35	1470	85	61	20	RTP/4NW
Land at Kings Drive, Kings Business Park	Prescot / Whiston	6.59	20	13180	70	16	577	Locational Precedent
Land Adjacent Nexus Business Park, Off School Lane, Knowsley Business Park	Prescot / Whiston	1.26	75	9465	80	26	297	Parameters of Previous Scheme
Land at Kings Business Park, Off Liverpool Road	Prescot / Whiston	1.26	20	2520	70	16	110	Locational Precedent
Land Adjacent To 42 Randles Road, Knowsley Business Park	Prescot / Whiston	0.92	33	3045	85	61	42	Planning Permission & RTP/4NW
Land adjacent Former Ethel Austin Site, Ainsworth Lane, Knowsley Business Park	Prescot / Whiston	2.25	35	7875	85	61	110	RTP/4NW
Land Adjacent To CDMS, Fallows Way	Prescot / Whiston	0.55	19	1039	80	45	18	Planning Permission & RTP/4NW
School Boys Plantation, Randles Road, Knowsley Business Park	Prescot / Whiston	0.29	35	1015	85	61	14	RTP/4NW
Land To The Rear Of Whiston Works, Fallows Way	Prescot / Whiston	0.89	31	2750	80	42	52	Planning Permission
Ainsworth Lane / Penrhyn Road, Knowsley Business Park	Prescot / Whiston	0.26	35	910	85	61	13	RTP/4NW
Land at junction of Randles Road & Gellings Road, Knowsley Business Park	Prescot / Whiston	0.33	35	1155	85	61	16	RTP/4NW
Batleys Cash And Carry, Fallows Way, Whiston	Prescot / Whiston	1.22	28	3410	85	61	48	RTP/4NW

Site Name	Area	Site Size (ha)	Plot Ratio Assumption (% rounded)	Gross Floorspace (GIA - sq.m)	Gross to Net Ratio (%)	Employment Density Assumption (sq.m per FTE rounded)	Estimated Job Yield (FTE)	Data Source / Methodology
Batleys Cash And Carry, Fallows Way, Whiston	Prescot / Whiston	0.44	20	865	85	61	12	Planning Permission & RTP/4NW
Land off Ainsworth Lane, Knowsley Business Park	Prescot / Whiston	0.38	35	1330	85	61	19	RTP/4NW
Land bounded by Randles Road, School Lane and Gellings Road, Knowsley Business Park	Prescot / Whiston	0.92	35	3220	80	45	57	RTP/4NW
South Prescot (Area A)	Prescot / Whiston	21.15	35	74025	80	45	1316	RTP/4NW
Land adjacent to Former Ethel Austin Building, School Lane, Knowsley Business Park	Prescot / Whiston	5.06	35	17710	80	45	315	RTP/4NW
Units 17 - 21, Lion Court, Kings Drive, Kings Business Park	Prescot / Whiston	1.45	20	2900	70	16	127	Planning Permission & RTP/4NW
Land at Penrhyn Road / Villiers Road, Knowsley Business Park	Prescot / Whiston	0.85	35	2975	85	61	41	RTP/4NW
Land Opposite Contract Chemicals, Bounded By Penrhyn Road/Villiers Road, Knowsley Business Park, Knowsley	Prescot / Whiston	1.30	39	5132	85	300	15	Planning Permission
Land off School Lane & Overbrook Lane, Knowsley Business Park	Prescot / Whiston	2.00	20	4000	80	45	71	RTP/4NW
Land at Carr Lane, Prescot	Prescot / Whiston	3.18	35	11130	80	45	198	RTP/4NW
Land at Cronton Colliery, Cronton	Prescot / Whiston	24.51	35	85785	80	45	1525	RTP/4NW

Source: Local Plan Monitoring System (Knowsley MBC, 2013)