

## KNOWSLEY LOCAL PLAN: CORE STRATEGY

### KNOWSLEY METROPOLITAN BOROUGH COUNCIL

#### HEARING STATEMENT 5B

##### Matter 5 GREEN BELT

*Issue: Whether the selection of broad locations for development in the Green Belt is justified by the evidence and whether the mechanisms for release are clear and effective.*

##### Questions

###### Individual Green Belt sites

##### **5.13 KGBS1 Bank Lane, Kirkby. Is the selection of this site based on robust evidence?**

5.13.1 Appendix 6 of TR03 establishes that the selection of this location for release would be compatible with the principles of national Green Belt policy and would result in a clear and defensible Green Belt boundary. TR03 notes that there are clear positive impacts in relation to both the SA Objectives and the Strategic Objectives of the Plan. The deliverability of the site is evidenced by the representations from the site owner (Consultee ID: 100).

##### **5.14 KGBS2 Eastfield Walk, Kirkby. The assessment seems to categorise this site as broadly neutral primarily because of its small size. Is too much emphasis given to the issue of size when, on the face of it, this appears to be a suitable site on the edge of a main settlement which would have very little impact on the Green Belt (similar to KGBS7)? Why does the absence of sustainability benefits as a result of small size carry sufficient weight to justify rejection of this site?**

5.14.1 Due to the strategic nature of the Strategic Objectives (SOs) of the KLPCS the Council considers that the impact of individual sites on their delivery is unlikely to be significant unless there are clear cumulative impacts across a range of factors and/or a particular location is of a significant scale. Where an impact would not significantly influence delivery of one of the SOs a 'neutral' score was recorded in the site assessment in the Green Belt Technical Report (TR03).

5.14.2 The assessment of KGBS 2 is therefore to some degree predicated by its size. KGBS2 covers about 2 hectares and its capacity is limited to about 30 dwellings by its narrow depth and existing screening / woodland adjacent to the M57.

5.14.3 Due to this limited capacity and resultant lack of a measurable impact 'neutral' scores were recorded in relation to SO1-5 and SO9, which relate to economic

growth, rebalancing of the housing market, regeneration of deprived areas, town centre vitality, quality of place, and health and wellbeing.

5.14.4 The Council acknowledges that KGBS7 and KGBS2 are in similar locations adjacent to townships. However, KGBS7 will contribute more to the Strategic Objectives due to its scale (able to provide about 250 dwellings and 10 hectares of employment land) combined with the following secondary cumulative benefits:

- Location within a Principal Regeneration Area;
- Opportunity for mixed use development delivering new homes in addition to employment opportunities; and
- Potential to meet identified employment needs (i.e. a successor site for Kings Business Park as identified in EB07 and TR02).

5.14.5 Larger development locations also typically have a higher level of viability as evidenced in the Economic Viability Assessment (ref: EB06) and thereby can often contribute more to Plan objectives such as affordable housing.

5.14.6 Sites should only be released from the Green Belt where clear sustainability and/or benefits to the Plan can be demonstrated which outweigh any harm to the Green Belt and other potential negative effects. Where this balancing exercise does not demonstrate such "net benefit" the Council proposes to retain areas in the Green Belt. This situation applies to KGBS2.

**5.15 KGBS4 East of Knowsley Business/Industrial Parks. Is all the land in the northern parcel subject to an availability constraint? Is the assessment of economic potential and benefit consistent with that of the site to the north (KGBS3): both sites have similar proximity to the existing employment concentration but the sustainability assessment is very different – why?**

Availability of Northern Parcel

5.15.1 National Grid has an ownership interest in land in the northern parcel of KGBS4 (i.e. north of the A580. National Grid has confirmed that this parcel is subject to an availability constraint and not currently available for development. Subject to National Grid's future operational requirements further land may become available in the future. However they are not currently able to confirm this (AD15).

5.15.2 Whilst the Council proposes to remove this northern parcel of land from the Green Belt, due to the existing availability constraint it has not been included in the Council's employment land supply calculations (see Table 5.3 of the KLPCS). The assumed developable area for KGBS4 is illustrated at Appendix of the Green Belt Technical Report (TR03) and reflects National Grid's interests.

### Assessment of Potential

- 5.15.3 The assessment in TR03 identifies that development of KGBS3 would due to its significant scale (137 hectares) when compared to the existing extent of the Parks and KGBS 4, have a detrimental impact. This is because availability of employment land on such a significant scale (as presented by KGBS3) would result in unnecessary competition for sites and proposals for regeneration / remodelling within the Parks (as outlined by Policy CS11).
- 5.15.4 The development of KGBS4 will be consistent with the regeneration of the Parks as set out in "Delivering a New Future for Knowsley Industrial Park – Strategic Framework" (EB17) and KLPCS Policy CS11 (clause 1). Due to its smaller size KGBS4 is unlikely to provide competition for sites within the Parks. EB17 outlines that the Parks are currently underperforming and sets out a strategy to improve their profile and economic competitiveness. It advocates a broad 'zoning' strategy and measures to enhance gateway locations including KGBS4.
- 5.15.5 The "Sustainability Appraisal of Green Belt Locations" (SD08/08a) identified that development of KGBS3 may result in the removal and/or disturbance of peat based soils which exist in this site causing release of carbon into the atmosphere which would be harmful under Sustainability Appraisal Objective E5 and E3. Plan AD13 shows the extent of peat deposits / peat based soil in Knowsley<sup>1</sup> and demonstrates that this issue does not apply to KGBS4.
- 5.15.6 Finally, the assessment within TR03 (in relation to SO7) recognises the findings of the Knowsley Industrial Park Energy Network Feasibility Study (EB18), in concluding that KGBS4 is adjacent to a 'Priority Zone' for renewable and low carbon energy and has potential to connect to future decentralised energy networks. EB18 (see para 7.1-7.3.2) identified potential for two decentralised heat network 'clusters' directly adjacent to KGBS4 based on an assessment of existing heat demand densities, presence of large ('anchor') loads and potential for future connecting businesses.

### **5.16 KGBS5 Pinfold Lane, Knowsley Village. Is the rejection of this site based on robust evidence of all the environmental and other impacts?**

- 5.16.1 Whilst the Green Belt Technical Report (TR03) concludes that KGBS5 could be released whilst maintaining a robust Green Belt boundary, the assessment against the SA objectives and the SOs of the Plan demonstrates significant negative impacts due to the impact on Knowsley Village Conservation Area (CA), for example due to the loss of this area of open space. This is noting that the rural character and setting are highlighted as specific attributes of Knowsley Village in its published Conservation Area Appraisal (AD04).

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<sup>1</sup>Historically areas of peat have been subject to artificial drainage for agricultural purposes. Therefore an element of stored carbon may have been released, resulting in a degraded soil with peat-like characteristics. For the purposes of the SA/SEA process, and in the absence of site –specific assessments, a precautionary approach has been adopted whereby the whole area recorded as containing peat deposits is presumed to still contain peat.

**5.17 KGBS6 Knowsley Village. Has proper weight been given to the impact on the setting of the Historic Park and Garden? How much of the site is Grade 2 agricultural land? Is the site of value and importance for wildlife? Green Belt Technical Report (TR03) says it is “clear” that exceptional circumstances exist – is this really the case? Should this site be brought forward during the plan period rather than being ‘safeguarded’ land?**

#### Setting of Historic Park and Garden

5.17.1 Due to the importance of Knowsley Park – Historic Park and Garden (HPG) as a key asset for the Borough the Green Belt Study (EB08) identified parcels which fall within its boundary as having a ‘Prohibitive’ constraint. Parcels which are outside but within the setting of the HPG were identified as having a ‘restrictive’ constraint which (under the guidance in table7 of EB08) can potentially be mitigated.

5.17.2 The Green Belt Study (EB08) identifies that all the parcels which comprise KGBS6 (including K019, K022 and K023) are within the setting of the HPG. However, following the SA/SEA process (ref: SD08/08a) the Council concluded that the impact of any future development here would be satisfactorily mitigated by the following points:

- The presence of existing belts of mature trees along the perimeter of the site;
- The estate boundary wall (an important part of the character of the estate) is not in its original state and has been rebuilt in block work rather than traditional materials at Home Farm Road where it runs alongside KGBS6<sup>2</sup>; and
- The assumed housing density in KGBS6 has been reduced to 25 dwellings per hectare (compared to 30 for other Green Belt locations). This will also reduce impact on the setting of the adjacent Knowsley Village Conservation Area.

#### Agricultural Land Classification

5.17.3 According to the Provisional Agricultural Land Classification (ALC) maps (document AD11 in the Examination Library) about 16.95 hectares of KGBS 6 (about 29% of the gross site area) is Grade 2. The remainder is mainly Grade 6 with a small element of Grade 7.

5.17.4 The Post 1988 Agricultural Land Classification maps (AD20) are only available for the southern parcel and show the majority of this area to be Grade 2 with a small element of Grade 3a.

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<sup>2</sup> As confirmed by representations from Knowsley Estate (see AD05) in relation to the Knowsley LDF Core Strategy Preferred Options Report

- 5.17.5 The Knowsley Estate (Consultee ID: 72) provided a report (AD03) assessing in further detail the agricultural land classification of the southern part of KGBS 6 in 2011. This concludes that the location does not include any Grade 1 or 2 land, being split between sub grade 3a and 3b with a small proportion of non-agricultural land. The Council has no reason to dispute the conclusion of that report.
- 5.17.6 Although the report (AD03) is more detailed than the national ALC dataset, the Council has not given it significant weight in the site assessment process in TR03. This is because such information is not available for any of the other Green Belt locations being considered for development and the Council wished to assess all sites on a consistent basis. The conclusions regarding KGBS6 would not change if the findings of AD03 were given significant weight as the Council has adopted a worst case scenario in assessing the loss of bmv based on the MAFF 1988 and post 1988 ALC surveys. The Council has accepted that the development of this location would result in a loss of bmv ALC which is clearly outweighed by the positive impacts that the development of this location would have.

#### Ecological Value

- 5.17.7 Table 6 of the Knowsley Green Belt Study (EB08) identified location KGBS6 as being largely covered at the time by a Local Wildlife Site (LWS 40: Knowsley Park).
- 5.17.8 Subsequently the Council received further ecological information from Knowsley Estate which was evaluated as being robust on the Council's behalf by Merseyside Environmental Advisory Service (MEAS). DEFRA guidance on Local Sites (Local Sites, Guidance of their Identification, Selection and Management, Defra, 2006) states that a site must be of 'substantive nature conservation value' and/or form a buffer or link to neighbouring areas of nature value. On the basis of the information provided, MEAS evaluated the ecological interest to consider whether the features that led to the inclusion of this part of the LWS were still present; the area remained key to the functionality of the wider LWS; or they buffered it. A recommendation was made to the North Merseyside Local Sites Partnership (LSP) in 2013 that the boundary of LWS 40 be altered to a new boundary which excludes KGBS 6 (AD07).
- 5.17.9 This change to LWS 40 has been taken into account and formed Appendix 9 of the updated (submission version) Green Belt Technical Report (TR03). Although no longer falling within the LWS, parts of KGBS6 (mostly associated to the areas of woodland within or next to the location) are identified as Priority Habitat under the Natural Environment and Rural Communities Act 2006 and are Core Biodiversity Areas within the LCR Ecological Framework (LC06). This notation carries less weight than the previous LWS designation but is a material consideration within any future development proposals.

### Exceptional Circumstances / Phasing

5.17.10 Whilst the Council acknowledges the benefits of bringing KGBS 6 forward for development, the SA/SEA of Green Belt locations (SD08/08a) outlines that its development may result in negative sustainability implications. The most significant of these impacts relate to the following SA Objectives:

- E8: 'to protect, and where necessary, improve air quality' and;
- E10: 'to reduce the need to travel and improve choice and use of more sustainable transport mode'

5.17.11 These objectives were both scored as a 'major negative' and are predicated by the impact the site's development would have on sustainable transport patterns. Whilst Knowsley village contains a primary school, GP / health centre and a parade of shops it contains no railway station or a district / town centre. The SA therefore concludes that development in this location would have a high level of car dependence that could have a negative impact, particularly in relation to objective E10.

5.17.12 For these reasons, considered alongside issues relating to ecology (Priority Habitats), agricultural land loss and potential impact on the historic setting the Council proposes that KGBS 6 be 'safeguarded' for post plan period requirements. Whilst exceptional circumstances exist justifying the site's release from the Green Belt, there is a distinction between the performance of this location and other locations proposed to be released for development before 2028. The outcomes from the SA/SEA process (SD08/08a) are referred to in the summary appraisal of the site within Table 4.3 of TR03.

### **5.18 KGBS7 Knowsley Lane, Huyton. Is the selection of this site based on robust evidence?**

5.18.1 This site could be released without significant harm in the context of national Green Belt policy by re-aligning the boundary alongside the M57 which is a robust and defensible physical barrier.

5.18.2 The assessment of KGBS 7 within TR03 identified a range of positive sustainability attributes should this site be developed. Whilst it is noted that the development of this location will result in the loss of mainly Grade 3 agricultural land (as shown on the Provisional ALC Maps), it is considered that this negative impact is counterbalanced by significant social and economic benefits. TR03 identifies that this proposal has the potential to assist in the delivery of the SOs of CS01.

5.18.3 The landowner for KGBS6 submitted additional evidence (AD03) which concludes that the developable portion of this site is wholly Grade 3b and is not bmv agricultural land. Nonetheless, the Council based its assessment on a "worst case scenario" that development of this location would result in a loss of bmv land and even on this more stringent assumption concluded that harm resulting from the loss of agricultural land would be clearly outweighed by the positive impacts that the development of this location would have.

**5.19 KGBS8 Land at A58, Prescott. Is the selection of this site based on robust evidence of all the environmental and other impacts?**

5.19.1 This site could be released without significant harm in the context of national Green Belt policy by re-aligning the boundary to follow the A58, which is a robust and defensible boundary to the north of the site.

5.19.2 The assessment within TR03 concluded by stating that there are no significant negative impacts associated with the release of KGBS8 and that the location would have a positive impact on the delivery of the objectives of the KLPCS.

**5.20 KGBS10 Carr Lane Prescott. The Green Belt study states that release is compatible with Green Belt policy – but wouldn't development erode part of a very small gap between Prescott and Huyton, contributing to the merging of settlements?**

5.20.1 Although national Green Belt policy aims to maintain gaps between settlements (Green Belt Purpose 2), the Green Belt study (EB08) notes that not all such gaps need to be fully protected. The study identifies that KGBS10 is located within a 'Narrow Gap' which is sensitive to development but with potential to accommodate some development without merging settlements.

5.20.2 Paragraphs 5.26 – 5.34 of the Green Belt Study (EB08) explain in relation to Purpose 2 of Green Belt policy that whilst it is more likely that narrower gaps should be kept open to maintain separation other factors also need to be considered.

5.20.3 Whilst KGBS10 is within a 'Narrow Gap', the site is relatively 'well contained' by the M57 (to the west) and established woodland (to the north). Therefore the area can accommodate some development without setting a precedent leading to further encroachment in to the Green Belt in this locality or significantly decreasing the gap between Huyton and Prescott.

5.20.4 Due to the containment provided by robust physical features to the north and west of KGBS10, the new Green Belt boundary would be more robust than it is at present.

**5.21 KGBS11 South of Kings Business Park. Does the conclusion that this site should remain in the Green Belt follow from the analysis in the Green Belt Technical Report (TR03), in which sustainability impacts are either neutral or positive? Why does the conclusion not give greater weight to the almost complete absence of harm to the Green Belt (the parcel of land appears to be surrounded by built development) compared with most other sites in the assessment?**

5.21.1 The Council acknowledges that the SA/SEA process (SD08/08a) finds a range of neutral or positive impacts in relation to KGBS11. However, on balance is it considered that KGBS11 has a neutral or negative impact on the

majority of the SA Objectives. Table 1 below provides a total of the scores recorded for KGBS11 in relation to each SA Objective.

**Table 1: KGBS11 – Cumulative Tally of Scores against SA Objectives**

<b>SA Assessment Level</b>	<b>Total for KGBS11</b>
Major Negative (- -)	0
Minor Negative (-)	5
Uncertain (?)	1
Neutral (0)	13
Minor Positive (+)	3
Major Positive (++)	0

Source: Sustainability Appraisal of Green Belt Locations (SD08/08a)

5.21.2 KGBS11 performs similarly when assessed against the 9 SOs of CS01 with a total of 7 'neutral scores and 2 'minor positives'. As a result of the assessment process the Council considers on balance there is a lack of any clear rationale (or benefit) to justify the site's release from the Green Belt which would outweigh the loss of Green Belt land and any resultant albeit limited harm.

**5.22 KGBS14 South of Whiston. Is the selection of this site based on robust evidence of all the environmental and other impacts? What is the quality of agricultural land that would be lost? Should separate consideration be given to smaller development parcels? Should the release of this large site be phased and, if so, how?**

#### Site Selection

5.22.1 In the context of national Green Belt policy, this site could be released without significantly harming the integrity of the remaining Green Belt by re-aligning the boundary to follow Fox's Bank Lane (to the east) and Cronton Road (to the South) encompassing KGBS17 to the south. The new boundary would be robust and defensible.

5.22.2 The Green Belt Technical Report (TR03) identified significant positive sustainability impacts associated with the release of KGBS14 and that the location would have a positive impact on the delivery of a range of the KLPCS objectives.

5.22.3 The Council's evidence base on transport issues (EB10 and EB11) concludes that KGBS14 can be feasibly accessed without causing capacity issues, although off site improvements may be needed. A detailed transport assessment will be needed at planning application stage.

#### Agricultural Land Classification

5.22.4 The Provisional ALC Maps for Knowsley show that KGBS14 is predominantly Grade 2 land. A plan showing ALC at KGBS14 is in the Examination Library

(AD12). The weight attributed Agricultural Land Classification is explained in the Council response to Question 5.5.

5.22.5 The Post 1988 Agricultural Land Classification maps (AD20) are only available for the western part of this location and show that the majority of this area is Grade 3b with an element of Grade 3a.

#### Consideration of smaller parcels and phasing

5.22.6 The Council has considered smaller parcels within KGBS14. Whilst some of these are suitable for development it would not be appropriate for all of them to be fully developed. Some parcels are included in KGBS14 solely to enable a robust and defensible new Green Belt boundary to be created.

5.22.7 To assess KGBS14's likely capacity for development, consideration has been given to a range of planning and physical constraints. As a result the Council has identified an indicative 'developable area' (Appendix 6, TR03). However this will be subject to further refinement and change, for example to take account of further ecological assessments which have been commissioned by the Council.

5.22.8 The Council proposes to identify any broad parcels within the site and how these should be phased within its proposed KLPSADP as informed by a site wide master planning exercise. This will be informed by engagement with relevant landowners and any updated information on constraints and infrastructure requirements. It is not necessary to set this level of detail out in the KLPCS.

### **5.23 KGBS16 Edenhurst Avenue. Is the selection of this site based on robust evidence of all the environmental and other impacts?**

5.23.1 The Council is satisfied the selection of KGBS14 is robust and that exceptional circumstances justifying the location's release exist.

5.23.2 Representors opposing the release of KGBS16 have raised issues relating to flood risk, highways access, education capacity, ecology and consultation with Liverpool City Council.

5.23.3 The Strategic Flood Risk Assessment: Level 2 (EB15) provides information regarding flood risk on the site. The area identified by the Council as being potentially developable only includes parts of the site which are at low risk of flooding (i.e. excluding Flood Zones 2 and 3) and therefore capable of being developed without causing significant harm. Any proposals for development in the site would need to satisfy policy CS24 ("Managing Flood Risk") which would require appropriate flood mitigation measures and involve consultation with the Environment Agency, particularly if the proposals affect any part of the site within Flood Zone 2 or 3. The Council's approach to flood risk issues is set out in further detail in response to Questions 5.4 and 10.3.

- 5.23.4 The Council's evidence base on transport issues (EB10 and EB11) conclude that KGBS16 can be feasibly accessed without causing capacity issues, although off site improvements may be needed. A detailed transport assessment will be needed at planning application stage.
- 5.23.5 The Infrastructure Delivery Plan (IDP) (SD06, section 5.3) identifies how future requirements for primary schooling provision will be assessed. There was (at May 2013) a surplus of 907 and 300 places within primary and secondary schools respectively in Huyton and Roby excluding additional capacity that could be made available at existing school sites in the future (see Appendix 1: School Capacity within Huyton and Roby (May 2013)).
- 5.23.6 The LCR Ecological Framework (LC06) identifies that the ecological value of the site is limited with the exception of a small area identified as Priority Habitat (neutral semi-improved grassland) to the west of the site. It is unlikely that these areas will be developed as they are located with Flood Zone 3. This type of habitat is also commonly found throughout the borough.
- 5.23.7 The Council has used a wide range of consultation methods which as set out in its response to Question 1.2 significantly exceeded the statutory obligations. Although the leafleting carried out at previous stages of the KLPCS did not include direct posting to residents in Liverpool (adjoining KGBS17) further consultation is likely in the future for example connected with preparation of the KLPSADP document. Liverpool City Council (Consultee ID:103) has been consulted at several stages and not raised any concerns regarding KGBS16.
- 5.24 KGBS17 Cronton Colliery. Is any part of this land a potential minerals resource and, if so, would this be sterilised if the site was developed? Have the flood risk implications of this development been properly taken into account? Is employment development compatible with the intended use of part of the land as a country park? It is claimed that there would be benefits from developing this site in tandem with land to the north of the M62 (south of Whiston) - what are these benefits?**
- 5.24.1 The "Evidence Base for Minerals Planning in Merseyside" (LC05) identifies part of KGBS17 as having shallow coal resources, potentially suitable for surface working. The colliery spoil heaps were subject to coal washing in the 1980s. The surface coal resource covers large areas of Knowsley and is of unproven viability for future extraction. The KLPSADP document may identify a Mineral Safeguarding Area (MSA) covering this site. In common with other sites in the Green Belt (some of which are also underlain by the coal resource) KGBS17 is only suggested for development under exceptional circumstances to meet future development needs. For reasons set out in the Council's response to Question 10.4 the potential future designation of this area (or other areas covered by this issue) as an MSA should not be regarded as a significant constraint to its release from the Green Belt.
- 5.24.2 The assumed capacity for employment development at KGBS17 (in Appendix 6 of TR03) takes account of a range of planning and physical constraints and

views of landowners. The approach to flood risk is as outlined in response to Question 5.4.

5.24.3 The assumed capacity of the site excludes about 42 hectares largely covering the former colliery footprint which had extant planning permission for the country park (app ref: 07/009292/COU). Although this permission has now expired the Council and the owners of this area (the Land Trust) remain committed to supporting the delivery of the country park. The Council considers that an employment development and country park would be mutually compatible and understands that the Land Trust are of a similar view.

#### Cumulative Benefits of Developing KGBS14/17

5.24.4 The potential additional cumulative benefits of developing KGBS14 and 17 in tandem (see Appendix 6 of TR03) refer primarily to Strategic Objectives SO3 (Regeneration and Transform) and SO5 (Quality of Place) of the KLPCS. If KGBS17 were to be released in isolation from KGBS14 the site would be isolated from the urban area and would form an inconsistent Green Belt boundary. Therefore, when appraising either site additional benefits that may occur should both sites be released were considered.

5.24.5 For example, when assessing KGBS14 against SO3 it was considered that in addition to temporary jobs associated with the development phase of the housing occurring, additional jobs (in this case permanent) may come forward at KGBS17 as a result of economic development.

5.24.6 In the context of SO5, a high quality development at both KGBS14 and 17 could improve the key sub-regional gateway location at the M62 / M57 "Tarbock Interchange". This would assist in the delivery of SO5 which aims to enhance Knowsley's "...key gateways and transport routes".

5.24.7 Finally, the cumulative benefits of developing both locations are noted by the SA/SEA of Green Belt Locations (para 4.6.2, SD08/08a) which states that due to the scale of the locations the development of both locations '*could have a positive cumulative impact on perceptions of the area and help support the wider regeneration of the area*'.

#### **5.25 KGBS19 and KGBS20 East of Halewood (north and south). Is the selection of these sites based on robust evidence of all the environmental and other impacts?**

5.25.1 The development of these locations would be consistent with the principles of national Green Belt policy and that the Green Belt boundary could be realigned to appropriate robust boundaries. TR03 also notes that the development of this location could deliver significant economic and social benefits. Whilst the development of this location would result in the loss of agricultural land it is considered that the significant benefits associated with this location outweigh the harm due to the loss of such land.

5.25.2 Representations have been received which highlight potential flood risk issues affecting KGBS19. The evidence (EB15) concludes that appropriate flood mitigation measures could be adequately dealt with as part of the future development of this location.

5.25.3 The Council has adopted a precautionary approach to identifying the potential development capacity of KGBS19, where Flood Zones 2 and 3 have been excluded from the proposed 'developable area' (see Appendix 6 of TR03).

**5.26 Alternative site A, Shrog's Farm. Is the rejection of this site for employment development based on robust evidence? Would development of this site be viable having regard to flood risk and highway access constraints?**

5.26.1 This site was discounted from consideration for Green Belt release at Stage 2 of the Green Belt Study (EB08), which appraised the sites against the five purposes of including land in the Green Belt as defined in Paragraph 80 of the NPPF. The site was rejected due to its location within the M57 Corridor which forms a narrow strip of Green Belt between Kirkby and Liverpool (Gilmoss / Croxteth) and forms an 'Essential Gap' as referred to in EB08.

5.26.2 Essential Gaps are defined by EB08 (see para. 5.31) as areas '*...where any further development would reduce the gap between settlements to an unacceptable width*'. Although ALT-A is well contained by existing highway infrastructure it is within an already narrow strip of Green Belt. Development of the site would potentially lead to further piecemeal incursions into the Green Belt in other sites. This could reduce the permanence of the Green Belt within this corridor and undermine the corridor's function in keeping neighbouring settlements separate.

5.26.3 ALT-A is also almost entirely within Flood Zone 2 as defined on the Environment Agency Flood Maps (August 2013) (AD14). There are sequentially more appropriate employment locations within the Borough.

5.26.4 The location forms part of the M57 Corridor 'Strategic Green Link' referred to in policy CS8 and its development would have a negative impact on objectives relating to Green Infrastructure and biodiversity.

5.26.5 There are no overriding sustainability or strategic considerations that would override the harm that would result from the development of this location.

**5.27 Alternative site B, Axis Business Park. Is the rejection of this site for employment development based on robust evidence?**

5.27.1 As outlined in response to Question 5.26, the Green Belt Study (EB08) discounted areas of Green Belt which should not be developed in order to maintain gaps between settlements.

5.27.2 Alternative Site B (ALT-B) is also located within the narrow M57 Green Belt corridor. Development within this location would thereby undermine the purposes of Green Belt policy via the merging of settlements.

5.27.3 The Green Belt Technical Report (TR03) concluded that there were no overriding sustainability or strategic considerations that could override the harm that would result from the development of this location. Sufficient land is being brought forward in more suitable locations elsewhere to meet Knowsley's employment land needs up to 2028.

**5.28 Alternative site C, Epicentre adjacent to M57. Is the rejection of this site too simplistic and based on robust evidence? Is the availability of this land markedly better than alternative employment locations?**

5.28.1 As outlined in response to Question 5.26, the Green Belt Study (EB08) discounted areas of Green Belt which should be kept substantially free from development in order to maintain gaps between settlements. Alternative Site C (ALT-C) is also located within the narrow M57 Green Belt corridor and also within a narrow gap between Kirkby and Knowsley Village. The Study (EB08) therefore concluded that development within this location would undermine one of the principles of Green Belt policy via the merging of settlements.

5.28.2 The Green Belt Technical Report (TR03) concluded that there were no overriding sustainability or strategic considerations that could override the harm that would result from the development of this location.

**5.29 Alternative site D, Lydiate Lane. Is the adjoining land to the north and north-west (in Liverpool City) in the Green Belt? How significant a constraint is the adjoining sewage treatment works? Does the analysis in Green Belt Technical Report (TR03) give sufficient weight to the overall benefit when assessed against the Strategic Objectives?**

5.29.1 As outlined in response to Question 5.26, the Green Belt Study (EB08) discounted areas of Green Belt which should be kept substantially free from development in order to maintain gaps between settlements. Alternative Site D (ALT-D) is located within a narrow area of Green Belt between north Halewood and Liverpool (Gateacre) that extends into the area covered by Liverpool City Council. Paragraph 5.31 of the Green Belt Study (EB08) defines this area as an 'Essential Gap'. Development in this location would undermine one of the principles of Green Belt policy via the merging of settlements. Furthermore, development in this location is unlikely to be well contained by robust boundaries to the north and east and is likely to result in a poorly defined Green Belt boundary.

5.29.2 The adjoining land to the north and north-west is designated as Green Belt in the Liverpool Unitary Development Plan (LC24). Liverpool's emerging Local Plan<sup>3</sup> does not indicate any intention to review this area of Green Belt. The

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<sup>3</sup> Liverpool City Council consulted on its LDF Core Strategy Submission Draft in April/May 2012 (LC25).

adjacent areas of Green Belt in Knowsley and Liverpool would be more vulnerable to development should ALT-D (or part thereof) be released. Plan 1 of the Green Belt Study (EB08) shows the extent of the Merseyside Green Belt to the north of Halewood within the Knowsley and Liverpool administrative areas.

- 5.29.3 The Green Belt Technical Report (TR03) concluded that there were no overriding sustainability or strategic considerations that could override the harm that would result from the development of this location.
- 5.29.4 Contrary to the views expressed by the landowner national Green Belt policy has been correctly applied in relation to this site in EB08. Whilst Halewood is physically connected to the Liverpool conurbation, it has its own identity and characteristics as a township area as set out in chapter 6 of the KLPCS. The treatment of Halewood as a distinct urban area in the Green Belt Study is consistent with that of Huyton (which is connected to Liverpool) and Prescot / Whiston (which is connected to parts of St Helens).
- 5.29.5 As noted by the Merseyside Green Belt Local Plan (para 2.3, PG44), Policy 11.3 of the Merseyside Structure Plan (1980) (see extract from Key Diagram and Section 11: Green Belt available as AD09 established a need for a Green Belt '*east of the River Mersey around the principal settlements and including green wedges into the conurbation*'. The Council's identification of an 'Essential Gap' to the north of Halewood extending into Liverpool is consistent with these principles.
- 5.29.6 Whilst green wedges are not specifically mentioned within the NPPF, it is considered reasonable that such 'wedges' are able to perform a role in preventing neighbouring settlements merging into one another as outlined by Green Belt Purpose 2 (para 80, NPPF).
- 5.29.7 Keeping this site as Green Belt accords with the NPPF (paragraph 17, 5<sup>th</sup> bullet) which requires planning to take account of the different roles and character of different areas and protecting the Green Belts around them.

**5.30 Other alternative sites. Are there other sites which, based on the evidence, justify release from the Green Belt for development?**

- 5.30.1 The Green Belt Study (EB08) includes a comprehensive review of parcels of land across the whole of the Knowsley Green Belt. There are no other sites which justify release from the Green Belt.

**Appendix 1: School Capacity within Huyton and Roby**

**Table 1: School Capacity within Huyton and Roby (May 2013)**

<b>School Name</b>	<b>Number on Roll May 2013</b>	<b>Capacity</b>	<b>Surplus</b>	<b>Admission Number (reception)</b>
<i>Primary Schools</i>				
THE SYLVESTER PRIMARY SCHOOL	197	210	13	47
ROBY PARK PRIMARY SCHOOL	166	288	122	41
PARK VIEW PRIMARY SCHOOL	235	378	143	54
LONGVIEW COMMUNITY PRIMARY	254	354	100	50
MOSSCROFT	122	175	53	30
BLACKLOW BROW PRIMARY	205	210	5	30
HUYTON-WITH-ROBY CE PRIMARY	392	420	28	60
ST. GABRIEL'S CE PRIMARY SCH.	186	210	24	30
ST AIDAN'S CATHOLIC PRIMARY	167	154		25
ST. ALBERT'S CATHOLIC PRIMARY	140	172	32	35
HUYTON ST. JOSEPH'S RC PRIMARY	172	210	38	30
ST. BRIGID'S R.C. PRIMARY	184	210	26	30
ST COLUMBA'S PRIMARY SCHOOL	189	315	126	51
HOPE PRIMARY SCHOOL	257	420	163	60
STOCKBRIDGE VILLAGE PRIMARY SCHOOL	176	210	34	30
<i>Secondary Schools</i>				
HUYTON ARTS AND SPORTS CENTRE FOR LEARNING	1001	1301	300	260

Source: Policy, Impact and Intelligence (Knowsley MBC, 2013)