

KNOWSLEY LOCAL PLAN: CORE STRATEGY

KNOWSLEY METROPOLITAN BOROUGH COUNCIL

HEARING STATEMENT 13A

2. COUNCIL'S RESPONSE TO INSPECTOR'S INTERIM FINDINGS

Short term land supply and release of Green Belt sites

2.1 *Is the designation of 'reserve locations' as Sustainable Urban Extensions and the omission of a phased approach to their release (new policy SUE 1) justified by evidence?*

Consideration of Options

- 2.1.1 The Council's approach to the allocation of the Sustainable Urban Extensions (SUEs) has had regard to the importance of meeting objectively assessed needs for housing and of maintaining a 5-year deliverable housing land supply as required by the National Planning Policy Framework (NPPF) (paragraph 47). These issues are also emphasised by the Inspector's Interim Findings (paragraph 2, EX26). In the context of the SUE allocations the Council has also considered the need to address qualitative employment needs (paragraphs 160-161, NPPF).
- 2.1.2 The vision and Strategic Objectives of the Core Strategy translate many of the above mentioned NPPF requirements into local objectives. Of specific relevance to the allocation of the SUEs are Strategic Objectives 1-3. These relate to sustainable economic growth, the rebalancing of Knowsley's housing market and the regeneration of deprived areas of Knowsley. These Strategic Objectives have also been considered in allocating the SUEs.
- 2.1.3 The Council has addressed the Inspector's Interim Findings as they relate to deficiencies in short term housing and qualitative employment land supply via the proposed modifications, specifically the conversion of the previous 'reserve' locations to SUE allocations.
- 2.1.4 To determine whether all or a more limited selection of the 'reserve' Green Belt locations should be allocated, the Council has considered 4 'strategic options'. These 4 options are summarised at paragraph 2.11 of the Sustainable Urban Extensions Technical Report (TR07) and are based on the 3 options initially presented in the Council's note following the hearing sessions on matters 3 and 4 (AD37).
- 2.1.5 To evidence the Council's approach to allocating the SUEs the sustainability implications of each 'strategic option' were considered by the Sustainability

Appraisal/Strategic Environmental Assessment (SA/SEA) process¹ and an assessment of the strategic 'positive' and 'negative' implications of each option (see SUE Modifications Options Matrix at Appendix 2 of TR07).

- 2.1.6 The results of this assessment in relation to each strategic option are outlined in paragraphs 2.17-2.41 of TR07. In summary this section identifies that Option 1 (Preferred Approach) is the only option that would fully address the identified shortfall of 391 dwellings in deliverable housing land supply from 1 April 2013 as identified by the Inspector whilst also leaving sufficient contingency over and above housing land supply requirements, should 1 or 2 sites fail to come forward as currently anticipated. TR07 (Appendix 14) provides a breakdown of housing delivery by SUE and illustrates how the omission of specific sites may impact on the availability of a 5 year land supply.
- 2.1.7 Although the Council would theoretically be able to not allocate one or two smaller sites and still address the shortfall in deliverable housing land supply, this approach is not considered 'sound' due to the need to ensure flexibility in the strategy and have a contingency of sites as highlighted above.

Impact on Regeneration

- 2.1.8 The Council's preferred approach is in essence a re-phasing of the 'reserve' locations outlined in the Core Strategy submission document (CS01) as their release from the Green Belt would take place earlier in the plan period. The overall quantum of land with capacity for housing and employment uses to be removed from the Green Belt has not changed significantly from the approach outlined in the submission version of the KLPCS (CS01). The submission document identified capacity for between 42.39 and 45.75 hectares of employment land and between 3258 and 3332 dwellings within the 'reserve' Green Belt locations. As a result of the modifications process (see modification M168) this quantum has changed to 47.21 hectares of employment land and 3282 dwellings. These changes are principally a result of ongoing engagement with landowners following the November 2013 examination hearings (see Table 4.1, TR07) and changes required following the Inspector's Interim Findings (paragraph 10-11).
- 2.1.9 The revised housing trajectory (see M060) shows that the peak in residential delivery is greater and occurs earlier in the plan period when compared to the submission version of the trajectory (see Figure 5.1, CS01). This is mainly due to the re-phasing of the SUEs which results in a greater overlap with delivery of urban sites, including some Principal Regeneration Areas (PRAs).
- 2.1.10 The approach in the Core Strategy submission document (CS01) at Policy CS5 (clause 3(b)) sought to ensure that the timing of the release of the Green Belt locations did not undermine delivery of regeneration projects. This issue has been considered in re-phasing Green Belt release and noting the

¹ Knowsley Local Plan: Core Strategy Proposed Modifications – Sustainability Appraisal Report (SD28)

Inspector's Interim Findings (paragraph 13) which state that the Council requires '*compelling evidence*' to support any concern that PRA delivery could be adversely affected by the allocation of SUEs.

- 2.1.11 Any adverse impact associated with allocating all the SUEs is potentially the greatest in relation to the two housing-led PRAs at: North Huyton and Stockbridge Village; and Tower Hill, Kirkby. These two locations are significant in scale with a focus on housing delivery within challenging local markets.
- 2.1.12 In relation to each of these PRAs the Council is aware of no evidence that would categorically prove a negative impact on these PRAs as a result of allocating the SUEs. This does not confirm that there would not be any adverse impact, but highlights that such an assessment cannot be accurately considered at this stage. This conclusion is consistent with the findings of the Green Belt Study (paragraph 5.54, EB08) which states that it would not be possible to assess whether the development of any Green Belt location would have a positive or negative impact on regeneration priorities as any such assessment would depend on the nature of the Green Belt proposals, scale of development and any links between the site and regeneration area. These matters would only become fully known at planning application stage when an assessment of a site's impact on regeneration priorities could only start to be considered. It should be noted that the delivery profile of the regeneration areas in question and many SUEs is likely to extend over a number of years. As a result any impact on delivery resulting from the SUEs may change as the phases of development progress. This further complicates the ability to accurately consider the implications of allocating the SUEs.
- 2.1.13 The Council considers that any potential risk of competition between Knowsley Lane, Huyton (KGBS 7) and housing development at North Huyton and Stockbridge Village PRA has been significantly reduced due to the reduced quantum of residential development at Knowsley Lane, Huyton. It is now proposed that this site is allocated for mixed uses, including approximately 100 dwellings. This is a reduction from 252 dwellings under the approach in the Core Strategy submission document (CS01).
- 2.1.14 In relation to the Tower Hill PRA, the only potential risk posed by the SUEs is in relation to the neighbouring Bank Lane, Kirkby SUE (KGBS 1). Although the site's capacity for development has increased from 131 to 207 dwellings at modifications stage, as the site now has planning approval for housing² the question of whether or not the site is allocated in the Local Plan is unlikely to have a significant net impact on regeneration at Tower Hill.

Consideration of Landowner Intentions and Infrastructure

- 2.1.15 In addition to the assessment of which 'strategic option' would be the most appropriate and sustainable way to address the Inspector's concerns, the Council also re-engaged with a range of public sector partners and infrastructure providers (as listed at paragraph 4.5 of TR07). During this

² Planning approval ref: 13/00393/OUT

engagement the Council provided background information on each of the proposed SUEs, including site areas, likely phasing, delivery rates and site capacity. The purpose of this exercise was to ascertain if the early release of any or all of the SUEs would raise any issues from an infrastructure and/or deliverability perspective.

2.1.16 As part of the engagement with these bodies no objections were raised either to the principle of allocating any of the SUEs or to them being brought forward for development earlier in the plan period than previously proposed at Core Strategy submission stage (CS01).

2.1.17 The Council's engagement with landowners and/or their agents sought to gauge support for the re-phasing of Green Belt release and also ascertain their views on the likely delivery profile for the SUEs.

2.1.18 As a result of this process all key landowners confirmed that the re-phasing of the sites was acceptable in principal. However, there were a limited number of responses from owners of smaller 'parcels' of land that were not supportive of the allocation of South of Whiston (KGBS 14) and Land South of M62 (KGBS 17). As a precautionary approach these areas were excluded from the indicative developable area and the land supply calculations presented in the modifications. The net change in capacity for the above mentioned sites is presented at Table 4.1, TR07. TR07 (Appendix 5) also illustrates the areas of land that have been excluded.

2.1.19 The engagement with landowners and agents presented a range of views regarding the delivery profile of the SUEs. The SUE Technical report (Appendix 11) provides a summary of the contrasting views from these parties. Whilst the Council does not agree with all the responses received a balanced view has been sought, having regard to housing delivery monitoring for 2013/14. This information is considered in Section 5 of the SUE Technical Report (TR07).

2.2 *Does the approach to Sustainable Urban Extensions adequately address concerns about the availability of a five year housing land supply?*

2.2.1 The Council's preferred approach, i.e. the allocation of all SUEs, is the most robust method of ensuring the deficit in the 5 year housing land supply is addressed at the 1 April 2013 base date and during subsequent years.

2.2.2 The response to Question 2.1 highlights that this approach also allows for additional flexibility (or 'allowance') should 1 or 2 sites not come forward as currently anticipated. The evidence presented in the SUE Technical Report (TR07) considers 4 'strategic options' regarding the allocation of the SUEs. The strategic options include 2 which involve allocating a reduced range of SUEs on the basis of large vs. small site size (referred to as Options 2a and 2b, TR07) and Option 3 which would remove the phasing mechanisms but not remove the sites from the Green Belt or allocate them.

TR07 clearly outlines at Table 6.2 that none of these alternative approaches (i.e. Options 2a, 2b or 3) have the ability to address the deficit in the 5 year housing land supply.

- 2.2.3 The Inspector's Interim Findings note at paragraph 11, that none of the 'alternative' Green Belt sites warrant inclusion in the Core Strategy. Therefore, by allocating all SUEs the Council is taking all reasonable measures (in accordance with policies within the NPPF as a whole) to address the deficit in Knowsley's 5-year housing land supply.
- 2.2.4 TR07 (at Appendix 15) highlights that the allocation of the SUEs contributes 525 dwellings to the 5 year land supply up to 31 March 2018. This would increase the deliverable housing land supply at 1 April 2013 to 2831 dwellings (or 6.29 years).
- 2.2.5 The allocated SUEs also support the maintenance of a deliverable housing land supply for subsequent years within the plan period. Appendix 15 of TR07 illustrates that on the basis of current projections an adequate 5 year supply can be demonstrated each year from 1 April 2013 until 2022/23³⁴.
- 2.2.6 This potential deficit, albeit in the longer term towards the end of the plan period, supports the need for flexibility to bring forward 'safeguarded land' at Knowsley Village within the plan period as a remedial measure should it be required to maintain a 5 year housing land supply (see Appendix D of the Core Strategy (modification M271)).
- 2.3 *Is the treatment of safeguarded land at Knowsley Village justified by evidence? Is the potential development of this land before 2028 if required to maintain a five year housing land supply (new policy SUE 1) consistent with national policy?*
- 2.3.1 At Core Strategy submission stage (CS01) the Council also proposed via Policy CS5 (part 4) that safeguarded land at Knowsley Village (KGBS 6) be afforded a degree of flexibility to come forward in advance of 2028, if necessary to maintain a 5-year deliverable supply of sites.
- 2.3.2 The Council's position in relation to the status of this site remains the same as at submission stage, albeit with the site now removed from the Green Belt and formally identified as safeguarded land rather than as a 'broad location'.
- 2.3.3 Current projections of land supply and delivery suggest that the Council may not be able to demonstrate a 5 year deliverable housing land supply toward the end of the plan period up to 2028. Proposed Policy SUE 1 makes provision for the safeguarded land at Knowsley Village (KGBS 6) to be released for development in this scenario. This provision allows the Council flexibility in being able to maintain its 5 year land supply in the longer term.

³ Assuming that the 5% NPPF buffer applies at this time in line with the housing land supply projections outlined at TR07 Appendix 15.

⁴ NB: At paragraph 6.9 TR07 incorrectly states this will occur in 2019/20.

2.3.4 This potential of a deficit, albeit in the longer term towards the end of the plan period, supports the need for flexibility to bring forward Knowsley Village within the plan period should it be required to maintain a 5 year housing land supply.

2.3.5 Further justification for the Council's approach can be found in the response to Question 5.9 of Statement 5A in response to Matter 5 which can be briefly summarised as:

- Whilst adequate land has been identified to meet needs up to 2028, the Council has been mindful of the NPPF advice that Plans should be flexible and able to cater for unforeseen circumstances in line with the NPPF paragraph 157 which states that Local Plans should '*allocate sites to promote development and flexible use of land*';
- Although the NPPF (paragraph 85, bullet 4) states that permission for the development of safeguarded land should only be granted after a review of a Local Plan, this approach is considered overly restrictive in Knowsley's case due to the significant quantum of housing provision to be delivered on a limited number of large sites (i.e. South of Whiston (KGBS 14) and East of Halewood (KGBS 19/20) – thereby making this element of supply vulnerable should one or both of these sites not come forward as currently anticipated.

2.4 *Are the criteria to be applied to development of Sustainable Urban Extensions (new policy SUE 2) justified and effective?*

2.4.1 The Council considers the criteria in the new policy SUE2 to be appropriate. This is because the emerging Core Strategy follows effectively a 'hybrid' approach, combining the Vision, Strategic Objectives and higher level policies typically found in a Core Strategy with a number of detailed site allocations and associated policies.

2.4.2 In the Council's view, it would not be justified or effective to allocate any site for development without an appropriate policy framework also being put in place at the same time to guide subsequent planning applications. This matter is particularly pertinent when allocating sites of this scale and strategic importance to the delivery of the Plan as a whole. The criteria in policy SUE 2 will support the effective delivery of the SUEs and are needed due to the scale of the sites, the need to address infrastructure requirements comprehensively and to ensure their delivery contributes to sustainable development.

2.4.3 The rationale for each of criteria a) to k) in policy SUE 2 (part 1) is discussed below:

- a) Delivery of sustainable development is a core element of the NPPF and the Plan (see Policy SD1). Due to the scale of the SUEs this core principle is restated at the outset of policy SUE 1;

- b) This criterion has been included as many of the SUEs are significant in scale, not previously developed (i.e. green field) and represent significant extensions to the existing urban area. There are likely to be significant upfront and ongoing infrastructure requirements associated with bringing all these sites forward for development. Furthermore, the Sustainable Urban Extension Technical Report (TR07) (Appendix 3) highlights the need for highway infrastructure issues to be considered comprehensively as part of the master planning and development process at South of Whiston (KGBS 14) and Land South of M62 (KGBS 17).
- c) Due to their scale, some of the SUEs will accommodate a significant number of new households and/or new localised communities. This criterion aims to ensure any new communities and/or homes are appropriately integrated into Knowsley's existing urban area. This is in line with Strategic Objective 3 which states that areas should be regenerated to form sustainable, safe, healthy and cohesive communities [*emphasis added*].
- d) This criterion links to policy CS 2, which seeks to deliver sustainable communities and healthy environments. It is justified because the scale of some SUEs make it particularly likely that the 'development assessment tools' listed in criterion 2 of policy CS 2 will need to be applied as part of the development process.
- e) This element is considered appropriate due to the scale of the sites combined with their potential to contribute towards Strategic Objectives 1 to 3 of the Plan relating to sustainable economic growth, re-balancing the housing market and the regeneration / transformation of the borough. Furthermore, in the cases of South of Whiston (KGBS 14) and East of Halewood (KGBS 19/20) the sites represent some of the largest and most strategically important development opportunities within the Borough. Therefore it is essential that these sites deliver development that meets both local and borough-wide needs.
- f) Some of the SUEs include green field land, ecological assets and/or areas of existing Public Open Space (POS) (see Green Belt Study EB08). Although these areas fall within the SUEs some assets need to be afforded varying degrees of protection. Although this is provided by other Plan policies it is considered helpful to highlight the requirements for such types of provision and the need for these assets to be considered strategically as part of the Green Infrastructure network (in line with policy CS8). Criterion f) also refers to the provision of walking and cycling routes as part of the Green Infrastructure network. This is to ensure existing and proposed areas of open space remain connected and accessible, whilst also providing access to outdoor sporting and recreation opportunities within the wider Green Belt in line with the NPPF (paragraph 81).

- g) This criterion is required to ensure the SUEs (particularly the larger sites) include suitable transport links to minimise the reliance on car usage. This is noting the evidence in the Local Plan Transport Feasibility Study (EB10) and Transport Modelling Report (EB11) which highlight the need for site-specific transport mitigation measures and improvements to public transport infrastructure. Furthermore, comments from the Highways Agency regarding Junction 6 of the M62 highlight the potential for additional pressure being placed on the highway network in the area surrounding South of Whiston (KGBS 14) and Land South of M62 (KGBS 17). This criterion seeks to minimise these potential adverse impacts. In the light of this evidence, there is also a need to consider transport issues in greater detail as part of the proposed master plan Supplementary Planning Documents (see response to Q.2.5). This criterion provides a policy 'hook' for further guidance to be prepared as required.
- h) As highlighted in relation to criterion e) above, development of the SUEs could contribute towards a range of Strategic Objectives. This criterion supports delivery of Strategic Objective 3 (regeneration and delivery of cohesive communities) and Strategic Objective 5 (enhancement of quality of place) by ensuring that the development of the SUEs enhances local distinctiveness and identity whilst contributing to community cohesion.

Many of the SUEs are located within prominent and/or gateway locations. This criterion supports the delivery of high-quality design which will improve these locations. The enhancement of gateway locations will assist in delivering strategic regeneration and corporate objectives as outlined in the submitted KLPCS (CS01) and the Strategy for Knowsley (PRG31) respectively.

- i) This criterion supports the protection and enhancement of historic and architectural assets. It is considered appropriate due to the presence of such assets within some of the SUEs and within the surrounding areas. This criterion supports criterion c) by highlighting historic features, which can be used in the design of new development to integrate with the design of established communities.
- j) The SUEs at Bank Lane, Kirkby (KGBS 1), Edenhurst Avenue, Huyton (KGBS 16), Land South of M62 (KGBS 17) and East of Halewood (KGBS 19/20) include areas subject to Flood Zones 2 and 3, although it is not presumed that the areas affected by severe flood risk will be developed. The indicative developable areas for each SUE (illustrated at Appendix 6 Green Belt Technical Report (TR03)⁵) include no areas

⁵ The indicative developable areas presented in the Green Belt Technical Report (TR03) for South of Whiston (KGBS 14) and Land South of M62 (KGBS 17) are updated at Appendix 5 of the Sustainable Urban Extensions Technical Report (TR07) as a result of new evidence becoming available.

within Flood Zone 2 or 3 based on available evidence⁶ at the time of publication.

This criterion allows for due consideration to be given to flood risk and newly emerging flood risk information at planning application stage and highlights the need for a sequential approach to the development of SUEs that are subject to flood risk. This is consistent with the NPPF (paragraph 100) which states that Local Plans should develop policies to manage flood risk, taking account of advice from the Environment Agency and apply a sequential, risk-based approach to the location of development. Criterion j) will also guide the proposed master plan SPDs for East of Halewood and South of Whiston/Land South of M62 which both contain areas of flood risk. Each of these sites may require significant flood mitigation measures and it is critical that the appropriate policy framework is in place to ensure flood risk issues are effectively managed and mitigated where appropriate.

- k) This criterion allows for the creation of a clearly defined edge to the urban area and resultant Green Belt boundary, thus reinforcing the permanence of the new boundary in the future. It is consistent with paragraph 83 of the NPPF which states that new Green Belt boundaries should be defined by physical features that are '*recognisable and likely to be permanent*'.

2.4.4 Part 2 of policy SUE2 cross refers to Appendix E 'SUE Allocation Profiles' of the Core Strategy (see M272), which outlines the key attributes, constraints and opportunities affecting each site. It is considered appropriate to refer to these due to the scale and/or complexity of the sites and to inform any pre-application discussions. The provision of this guidance should assist in the timely delivery of the sites by streamlining the application process for the sites and ensuring that the Council's expectations for the development of the sites are clear at the outset.

2.4.5 Part 3 of policy SUE2 cross refers to policies SUE 2 a) to c) and to the master planning of the three sites covered by these policies. This matter is addressed in Question 2.5 below.

2.5 *Is it appropriate to require the preparation of master plans and associated Supplementary Planning Documents to guide the development of the three largest sites?*

2.5.1 The proposed modifications outline at Policy SUE 2 (part 3) that the Council will prepare master plan Supplementary Planning Documents (SPDs) for Knowsley Lane, Huyton (KGBS 7), South of Whiston / Land South of M62 (KGBS 14/17) and East of Halewood (KGBS 19/20).

2.5.2 This approach is justified as a clear vision for the development of the sites needs to be developed due to their scale and strategic importance to the Plan

⁶ See AD14: Environment Agency Flood Zones – August 2013

as a whole. Furthermore, these sites involve a complex mix of infrastructure requirements, land ownership and/or physical constraints and a strategic approach needs to be taken to address these matters. The Council is taking a pro-active approach to addressing these issues to ensure any lead-in times for infrastructure and other preparatory works, which could otherwise impede delivery are considered from the outset of the planning process in a holistic manner. This will enable the maintenance of the 5 year housing land supply and availability of employment sites as highlighted by the Inspector's Interim Findings.

- 2.5.3 The Council adopted a similar approach in relation to key sites outlined in the Knowsley Replacement Unitary Development Plan (UDP) (2006) (PP01). UDP Policy H3 'North Huyton and Tower Hill Action Areas' states at criterion 4 that the '*Council and its partners will carry out master planning exercised for these areas...*'
- 2.5.4 The Council therefore has some experience of master plan SPDs and fully understand the need for early engagement with developers, infrastructure providers and other stakeholders. Such engagement has been built into the Council's draft project plan for the SPDs and is a requirement outlined in the project brief / Request for Quotation document (Appendix 4, TR07) (see p.123-124, Appendix 4 and p.109-111 respectively).
- 2.6 *Does the subdivision of land at Knowsley Lane, Huyton into specific employment (Use Class B1) and housing allocations (new policy SUE 2a) meet the identified needs? Are the other requirements of policy SUE 2a appropriate?*
- 2.6.1 In specifying the sub-division for this site the Council has had regard to the Inspector's Interim Findings (paragraph 10) which state that a '*significant and specified minimum area*' of land for a high quality business park should be identified at Knowsley Lane, Huyton (KGBS 6). The Council has interpreted the use of 'significant' in this context as meaning a quantum in excess of the 50% share of developable land area as presented at submission stage (see CS01). The Council's revised approach (including a mix of 17.5 hectares of employment provision and approximately 100 dwellings - see part 1, policy SUE 2a) represents an 80%/20% split based on developable land area.
- 2.6.2 The proposed minimum for business uses or other appropriate LCR key economic sectors is considered appropriate due to the quantitative and qualitative requirements, together with the land supply calculations presented as part of the reconvened hearings (see Table 12C.1, Appendix 1, Statement 12C). It is also noted that the Joint Employment Land and Premises Study (paragraph 12.42, EB07) suggests allocation of a high quality business park of up to 19 hectares.
- 2.6.3 In response to his evidence the Council has considered whether there is a case for identifying in excess of 80% of the site for employment uses, as this would also be consistent with the Inspector's Interim Findings and the need for a successor employment site and evidence base. This option has not been

pursued due to the market interest that has been demonstrated for housing on the site to date. It is noted that the site falls within the North Huyton and Stockbridge Village Principal Regeneration Area, which outlines the need for comprehensive housing-led regeneration of the area. The retention of an element of housing on the site allows for a valuable contribution in addressing localised regeneration requirements and the need for residential development during the plan period.

- 2.6.4 The implications of bringing forward the release of all the former "reserve" locations for the delivery of regeneration priorities are considered in the Council's response to Question 2.1. This notes that the lower quantum of residential development within this site (approximately 100 dwellings) reduces any potential adverse impact (when compared to the 252 dwellings proposed at submission stage) on housing-led regeneration at North Huyton and Stockbridge Village Principal Regeneration Area.
- 2.6.5 It is also considered that retaining an element of housing on the site allows for opportunities for cross subsidy between the two uses to be explored by the master planning and planning application processes. Whilst this has not been explicitly recognised in SUE 2a, it would remain as an option for the site particularly as the developable area is currently in single ownership. This additional flexibility may assist in the delivery of a comprehensive mixed use scheme.
- 2.6.6 Further information regarding the suitability of employment uses at this site and its contribution toward borough-wide requirements are discussed in response to Question 1.5.
- 2.6.7 Part 2 of this policy is considered justified due to the need to minimise any adverse amenity issues for nearby new or existing residents associated with the proposed mix of uses.
- 2.7 *Is the approach to development of land East of Halewood (new policy SUE 2b) appropriate?*
- 2.7.1 Part 1 of this policy stresses the need for comprehensive development of this site. The stated site capacity (of approximately 1,100 dwellings) accords with the assessment of constraints and developability in the Green Belt Study (EB08) and Green Belt Technical Report (TR03). Criterion 1 b) of the policy highlights (in line with the sequential approach to flood risk advocated by the NPPF) that the area adjacent to Ditton Brook is unlikely to be developable and should be used principally for Public Open Space and associated flood storage / mitigation.
- 2.7.2 Part 2 of this policy outlines more specific criteria for the development of the site, as considered in turn below:
- a) The highway requirements covered by this criterion are in line with the Transport Feasibility Study (EB10) which notes that upgrades to the junction at Lower Road / Church Road / Greensbridge Lane are likely be

required along with consideration of any cumulative impact on the A5300/A562 junction (see p.158, EB10). The policy also has regard to the Transport Modelling Study (EB11), which highlights the potential for increased travel time along roads adjacent to the sites (i.e. Lower Road and Finch Lane) by 2024.

- b) This clause is consistent with document EB10 (see p.15, EB10) which recommends a range of potential mitigation measures to reduce any pressure on the local highway network resulting from the development of the site. These aim to reduce car reliance by developing links with nearby public transport and other facilities stated in the policy.
- c) This criterion has been included due to the likely requirement for new infrastructure and services to support a large green field urban extension of this scale. The requirements are appropriate due to the size of the site and the potential for additional pressure to be placed on existing infrastructure and services in the area. They will be considered in further detail in the master planning and application process when the likely demand for services arising from the site can be more effectively measured and taken into account.
- d) This criterion has been included as a significant amount of the site abuts existing communities and homes in Halewood, to stress the need for the master plan and planning application processes to ensure good standards of amenity are maintained.

2.8 *Is the approach to development of land South of Whiston for housing and South of M62 for Use Class B8 employment (new policy SUE 2c) appropriate?*

2.8.1 Part 1 of this policy stresses the need for comprehensive development of these sites. The stated capacity (of approximately 1,500 dwellings and at least 22.5 hectares of employment development) accords with the assessment of constraints and developability in the Green Belt Study (EB08), Green Belt Technical Report (TR03) and Sustainable Urban Extensions Technical Report (TR07).

2.8.2 Criterion 1 b) of the policy specifies the type of uses that will be acceptable on the site. This approach is justified by the Joint Employment Land and Premises Study (paragraph 11.64, EB07) and Green Belt Study (EB08). These studies highlight that the site has potential for development within the Liverpool City Region key economic sectors, noting its strategic location on the M57/M62 'Tarbock Island' and its scale which make it attractive to the market. The allocation of this site for employment uses is also supported by the principal landowners on the site (see TR07) and it has previously been subject to market interest for such uses. Further information regarding the suitability of employment uses at this site and its contribution toward borough-wide requirements are discussed in response to Question 1.5.

2.8.3 The requirement for a country park in the broad extent of the former Cronton Colliery in criterion 1c) reflects the intentions of the owners of this area (the

Land Trust). A specific area of land for the country park has not been specified in the policy as there is no longer an extant planning permission for this use on the site. The approach also provides flexibility for the land owner to develop revised proposals, whilst allowing matters of detail, such as the interface between employment uses and the proposed park to be considered comprehensively by the proposed master plan SPD.

2.8.4 Part 2 of this policy outlines more specific criteria for the development of the site, as considered in turn below:

- a) The highway requirements covered by this criterion are in line with the Transport Feasibility Study (EB10) which notes that enhancements to Windy Arbor Road and the Cronton Road / Fox's Bank Lane junction are likely to be required (see p.168, EB10). The policy has also considered the Transport Modelling Study (EB11), which highlights the potential for increased travel time along Lickers Lane which is adjacent to the sites by 2024.
- b) Criterion b) is consistent with document EB10 (at p.168) which recommends a range of potential mitigation measures to reduce any pressure on Windy Arbor Road and at Tarbock Island (J.6, M62) and improve public transport connectivity. It also recognises the need to encourage sustainable transport via the use of existing assets such as the former mineral railway line within the sites.
- c) This criterion covers the constraints and opportunities affecting the sites relating to recreational assets, areas of ecological value and the Whiston to Cronton strategic green link. The importance of these assets is noted in the assessments of the sites in the Green Belt Study (Section 6 and Appendix 3, EB08) and in the 'Allocation Profiles' at Appendix E of the Core Strategy (see M272). Due to the range and complexity of these Green Infrastructure (GI) assets within the sites it is appropriate to refer to them within this policy. This reference also highlights the importance of these assets in the development of these locations. Further guidance will be outlined in the proposed master plan SPD for the sites.

To assist in the effective consideration of Green Infrastructure, the Council has recently completed a Phase 1 Habitat Survey (EB28) for this area with a Phase 2 Habitat Survey expected to be completed in summer 2014. This additional evidence will help implement this criterion and the master planning process.

- d) This criterion has been included due to the requirement for significant levels of new infrastructure and service provision to support a green field urban extension of this scale, including for example consideration of requirements for a new local centre and primary school provision. This is appropriate due to the size of the sites, and the potential for additional pressure to be placed on existing services within the urban area. The requirements will be considered in further detail in the master planning

and application process when the likely demand for services arising from the site can be more effectively measured and taken into account.

The Council has commissioned an 'Infrastructure and Development Options' study for the sites which considers the provision and availability of utility infrastructure. This will help to implement this criterion and complement the master planning of the sites. It is anticipated that this study will be completed in summer 2014.