

KNOWSLEY LOCAL PLAN: CORE STRATEGY**KNOWSLEY METROPOLITAN BOROUGH COUNCIL****HEARING STATEMENT 16A****MATTER 4: RESPONSE TO CONSULTATION ON MAIN MODIFICATIONS****Safeguarded land at Knowsley Village**

4.1 *Having regard to emerging matters including revisions to PPG relating to Green Belt protection, new household projections, evidence of increased densities on certain housing sites, and so on, and in light of recent substantial public opposition, is the proposal to safeguard land at Knowsley Village for housing development beyond the Plan period necessary and does it satisfy the exceptional circumstances test of national policy?*

4.1.1 The Council's Statements 15A, 15B and 15C outline its views regarding the recent changes to the Planning Practice Guidance (PPG), new household projections and housing land supply respectively. None of these statements identify any issues that require a strategic change to the Knowsley Local Plan Core Strategy (KLPCS) or its approach to Green Belt release, including any changes to the proposed allocation of safeguarded land at Knowsley Village.

4.1.2 The Council acknowledges that public consultation on the Proposed Modifications to the KLPCS in autumn 2014 gave rise to a level of response which was higher than at previous stages of public consultation. This included a significant level of response which related to the proposal to safeguard the site at Knowsley Village for potential residential development after 2028. This is notwithstanding the fact that the proposal to safeguard the land at this site had been included in the emerging Plan since the "Preferred Options" stage in 2011.

4.1.3 A summary of all matters raised by respondents to the Proposed Modifications consultation is set out in the Council's "Accounting for Proposed Modifications Representations" document (SD35), section 26, pages 177 – 187 of which specifically refer to the site at Knowsley Village. The Council has also set out, in document SD35, its initial observations regarding each of the issues raised by respondents. The issues raised include:

- Green Belt principles;
- Safeguarded status;
- Proposed Safeguarded Land boundaries;
- Existing uses;
- Proposed uses;
- Density of proposed development;
- Highways;
- Flora and fauna / ecology;

- Flooding;
- Infrastructure;
- Air quality; and
- Impacts on adjacent areas.

4.1.4 The Council's responses in document SD35 do not identify any need for further modifications to the KLPCS in relation to the proposed safeguarded land at Knowsley Village. This is because the substantive issues raised during the Proposed Modifications consultation had already been considered as part of the plan making process and/or during the Local Plan hearing sessions to date. The Council considers that the issues raised do not adversely affect the soundness or legal compliance of the KLPCS, including the Council's case regarding the exceptional circumstances which must be satisfied to justify changes to Green Belt boundaries in accordance with the National Planning Policy Framework ("the Framework").

4.1.5 It should also be noted that a number of the issues raised by representors in relation to this site would need to be considered afresh as part of the preparation of a future Local Plan after 2028. This would need to occur before any development could be permitted within the site at Knowsley Village – see paragraph 4.1.11 below. This process would include consideration of whether the site would need to be allocated for development at that time (as opposed, for example, to continuing to be safeguarded for a further period), as well as any more detailed policy wording which may be needed to guide how development could proceed (for example in relation to highways, flood mitigation, supporting infrastructure and design principles).

4.1.6 Therefore, none of the issues considered as part of this question represent new evidence or a material change in circumstance which warrants a change in the approach of the KLPCS in relation to the Knowsley Village site. For clarification, the following sections summarise the approach and supporting evidence which the Council has previously presented to justify its approach to the proposed safeguarded land at Knowsley Village.

The need to safeguard the land at Knowsley Village

4.1.7 The case for safeguarding the land at Knowsley Village has already been set out in earlier evidence and essentially comprises two issues which are:

- Should the KLPCS identify any safeguarded land for post 2028 development needs?; and
- If so is the land at Knowsley Village suitable for this designation?

4.1.8 In relation to the first of these points, the proposals to safeguard land for potential development after 2028 are included in the KLPCS in order to satisfy national policy in the Framework, in particular:

- Paragraph 83, which states that when Green Belt boundaries are altered they should be "...capable of enduring beyond the plan period"; and

- Paragraph 85, which states that, when defining new boundaries, local planning authorities should “...*satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period*”.

- 4.1.9 In the context of the KLPCS this means ensuring that the Borough’s Green Belt boundary should not need reviewing again at or shortly after 2028 (i.e. the conclusion of the plan period). Although the Knowsley Village site, given its estimated capacity for approximately 1,093 dwellings, would only provide just over two year’s housing supply (at the current target rate of 450 net dwelling completions per annum), the identification of this site as safeguarded land will help ensure that the requirements of paragraphs 83 and 85 of the Framework are met. This is particularly the case given that no other areas which are suitable for safeguarding to meet post 2028 development needs have been identified in the KLPCS.
- 4.1.10 The specific case for release of the Knowsley Village site from the Green Belt is outlined in the Green Belt Study (EB07), Green Belt Technical Report (TR03) and Sustainable Urban Extensions Technical Report (TR07). This process has also been supported by a full “Sustainability Appraisal” (SA) of potential Green Belt sites (SD08/08a) including Green Belt sites put forward as “alternatives” by the owners and/or potential developers of other sites across Knowsley. The site has also been assessed through the “Habitats Regulations Assessment” process (SD29a and SD29b). This evidence is supplemented by the Council Statement on Matter 5 to the November 2013 hearings (CH05B) which outlines, in response to specific issues raised by the Inspector, why the site at Knowsley Village should be safeguarded for post 2028 development. This Statement covered a range of issues which have been specifically raised during the Proposed Modifications consultation, including the setting of the historic park and garden at Knowsley Hall, and the value of the site as agricultural land and as a wildlife habitat, and also the specific approach to safeguarding the site. The identification of the site as safeguarded land has also been provisionally accepted by the Inspector as being “sound” (see Inspector’s Interim Findings Document EX26).
- 4.1.11 As set out below in response to Question 4.2, the development of the Knowsley Village site would only be permitted following a future Local Plan review after 2028. This is made clear in paragraph 6A.9 of the Proposed Modifications version of the KLPCS (CS09a) and is consistent with paragraph 85 of the Framework. A future Local Plan review after 2028 would include multiple stages of public consultation and would assess whether the development of the site (either in full or part) is needed, having regard to strategic land supply and assessment of development needs at that time. The Council considers that this approach remains justified in accordance with the Framework.
- 4.1.12 For reasons which are summarised above, the proposal to safeguard the land at Knowsley Village to meet post 2028 development needs remains necessary and compliant with national planning policy.

4.2 Given the representation submitted by Lord Derby, does the proposal to safeguard land at Knowsley Village for longer term housing development have the full support of the land owner? Is all the land likely to be available for development beyond the Plan period?

- 4.2.1 Throughout the process of preparing the KLPCS, the Council has consulted regularly with relevant landowners of potential future development sites, including the Knowsley Estate (Rep ID 72) and its appointed agents, in relation to the Knowsley Village site. In response, the Knowsley Estate has confirmed its support for the principle of Green Belt release at Knowsley Village since the site was identified in the Council's Green Belt Study (EB08). The representation made on behalf of the Knowsley Estate in response to consultation on the "Proposed Submission" version of the KLPCS in December 2012 (see Proposed Submissions representation 1072, a copy of which is available in document SD02) confirmed that this support related at that stage to the full extent of the identified site.
- 4.2.2 Before the response from the Knowsley Estate to the Proposed Modifications consultation in October 2014, the only significant difference between the position of the Council and of the Knowsley Estate concerning the Knowsley Village site related to phasing. The representation made on behalf of the Knowsley Estate at Proposed Submission stage (referred to in paragraph 4.2.1 above) expressed a preference for the proposed area of safeguarded land at Knowsley Village to be brought forward for development before 2028. This is earlier than proposed by the Council in the KLPCS, both at the Proposed Submission stage (see document CS01) and in the Proposed Modifications version of the KLPCS (CS09a). This case was also advanced by the Knowsley Estate within the November 2013 hearings, as referenced in their hearing statement RH23, and the July 2014 hearings, as referenced in their hearing statement RC07. The Council remains of the view that the entirety of the site should be safeguarded for potential development after 2028.
- 4.2.3 The representation of the Knowsley Estate at Proposed Modifications stage (set out in its letter dated 31 October 2014, a copy of which is available in document SD34h) responds to the significantly enhanced level of objection from nearby residents which it had become clear was likely to be received before the close of that consultation on 14 November 2014. It makes the following points in summary:
- Questioning whether 1093 dwellings could be satisfactorily accommodated in Knowsley Village;
 - The Council should consider the implications of 1093 dwellings on the village prior to allocating the site for development;
 - The Council must ensure future development is the correct size for Knowsley Village and is proportionate; and
 - An investigation into the impact the development would have on the village and community would be welcomed.

4.2.4 In the Council's view, these considerations have been addressed with proportionate evidence in the process of identifying the proposed "safeguarded" land, as summarised in the previous evidence relating to this site (see paragraph 4.1.10 above). The Sustainability Appraisal of alternative Green Belt sites (SD08/08a), for example, assessed in detail the social, economic and environmental implications of developing this and alternative sites. This process, together with the earlier Green Belt study (EB08), concluded that the site at Knowsley Village performed better than other alternatives which have not been proposed for release from the Green Belt, although the site was considered less appropriate for release prior to 2028 than the proposed Sustainable Urban Extension (SUE) sites.

Potential Future Allocation of the site via Local Plan Review

4.2.5 In accordance with paragraph 85 of the Framework, the proposed safeguarded land at Knowsley Village is not (under Policy SUE1, clause 2 of the Proposed Modifications to the KLPCS, see document CS09a) proposed to be allocated for development in the Plan period up to 2028. Paragraph 6A.9 of the Proposed Modifications version makes it clear that planning permission for the permanent development of this area of safeguarded land should only be granted following a future review of the Local Plan which proposes the development.

4.2.8 Any future Local Plan review would need to consider Knowsley's Objectively Assessed Needs for housing at that time. This assessment process will inform the overall quantum of land to be identified for development by any future Plan. Any Local Plan review would also be subject to multiple stages of statutory public consultation and stakeholder engagement to determine which locations are most suitable and sustainable for development. This would provide ample opportunity for engagement with residents and community groups as suggested in the representation of the Knowsley Estate in October 2014.

4.2.9 The evidence base studies mentioned in this statement (see paragraph 4.1.10 above) are considered robust and proportionate to the currently emerging KLPCS as they relate to proposals for safeguarded land at Knowsley Village. However, it is evident that to support any future allocation of the site for development via a Local Plan review, further more detailed evidence and policy guidance will be required for a site with capacity for approximately 1,000 dwellings. This would assess how much of the site would be required for development and also how much of the site would be deliverable as a development site having regard to the intentions of the owner, infrastructure and any other deliverability factors which may apply at that time.

4.2.10 This approach would be consistent with how the Council has handled proposals for allocation and development of other large SUE sites (e.g. the East of Halewood SUE or South of Whiston & Land South of M62 SUE) within the KLPCS. The development of these sites will be guided by detailed site-specific policies (see Policies SUE 2a-c) in the KLPCS and a further "spatial development framework" delivered via programmed Supplementary Planning

Documents (SPDs). The process of preparation of any SPD would include at least one period of public consultation and stakeholder engagement. Furthermore, if the Knowsley Village site was proposed for allocation in the future detailed technical studies may be required regarding utility infrastructure and highway capacity. Again, this is consistent with how the Council has supported the identification of the largest of the SUEs proposed in the KLPCS.

- 4.2.11 This additional site-specific evidence, in conjunction with an updated assessment of Objectively Assessed Needs for housing and consideration of wider spatial planning issues, along with landowner intentions at the time, will inform the preparation of future planning policy and ultimately decisions regarding the principle, timing and scale of potential land release at Knowsley Village. If allocation for development is proposed, there will also need to be a planning application (or multiple applications) for the Council to determine in consultation with relevant neighbours of the proposed development site.