

METROPOLITAN BOROUGH OF KNOWSLEY

To: The Leader and Members of the Cabinet

Meeting: 10 September 2014

Wards Affected: Borough-wide

Portfolio Areas: Regeneration, Economy and Skills

Key Decision

REPORT OF THE DIRECTOR OF REGENERATION AND HOUSING

KNOWSLEY LOCAL PLAN: CORE STRATEGY **APPROVAL OF FURTHER MODIFICATIONS**

1. PURPOSE OF THE REPORT

This report seeks approval to publish and consult on further modifications to the emerging Knowsley Local Plan: Core Strategy. The proposed further modifications supplement those which were approved by the Cabinet on 18 June 2014 and reflect the outcomes of further public hearings which were held in July 2014. The further changes are needed to ensure that the Plan will be found sound and can in due course be adopted by the Council.

2. RECOMMENDATIONS

Members of the Cabinet are recommended to:-

- (a) Note the further progress which has been made in developing the Knowsley Local Plan: Core Strategy, including the re-convened hearings held by the Inspector in July 2014;
- (b) Agree that in order to respond to points raised during the re-convened hearings the Knowsley Local Plan: Core Strategy should be further modified to:-
 - (i) Remove references to the land to the south and east of Knowsley Village (which is "safeguarded" for housing development after 2028) being potentially developed before 2028 if needed;

- (ii) Emphasise that proposals for development within the proposed Sustainable Urban Extensions (particularly the largest of these at Knowsley Lane, Huyton; East of Halewood; and South Whiston/Land South of M62) must demonstrate a comprehensive approach covering the relevant Sustainable Urban Extension as a whole, including appropriate contributions to the funding of any necessary infrastructure; and,
 - (iii) Include the other detailed policy changes summarised in section 5 of this report;
- (c) Approve the full schedule of further modifications to the Knowsley Local Plan: Core Strategy as set out at Appendix B to this report so that these may be considered during the next steps in preparing the Plan, which are set out in section 6 of this report; and,
- (d) Grant delegated authority to the Deputy Chief Executive in consultation with the Cabinet Member with Portfolio for Regeneration, Economy and Skills to authorise any further typographical or other minor revisions to the modifications in Appendix B to this report should this prove necessary.

3. BACKGROUND

- 3.1 The Knowsley Local Plan sets out a vision and strategy for the future development of Knowsley and its communities up to 2028. It provides an important delivery vehicle for the "Strategy for Knowsley" and thereby will help Knowsley to become the "Borough of Choice".
- 3.2 The Plan is being prepared as a series of documents. These include the Local Plan: Core Strategy (the Plan), a future Local Plan: Site Allocations and Development Policies document, and the Merseyside and Halton Joint Waste Local Plan (which was adopted in July 2013).
- 3.3 These documents will progressively replace the policies of the Knowsley Replacement Unitary Development Plan (2006). As each document is adopted, any necessary changes to the Council's published Policies Map (which is a separate document setting out allocations and designations of land for development) will be made. Various Supplementary Planning Documents are being prepared setting out further details where necessary. These include (of most relevance to this report) Supplementary Planning Documents to inform the master planning of development within the proposed Sustainable Urban Extensions at Knowsley Lane, Huyton; East of Halewood; and at South of Whiston/Land South of the M62.

3.4 The Council submitted the Plan (with over 60 supporting documents) to the Secretary of State for Communities and Local Government in July 2013. A Government Inspector (Mr Martin Pike) was then appointed to undertake an Examination in Public. The Inspector's role is to assess whether the Plan:-

- Satisfies all relevant legal requirements; and,
- Is "sound" (as defined by the National Planning Policy Framework), i.e. has been positively prepared and is justified, effective, and consistent with national policy.

3.5 The Inspector initially identified 11 Matters, 15 Issues, and 112 Questions to guide the Examination process. Hearings took place in Huyton between 5 and 21 November 2013 and the Council published initial potential modifications to the Plan (mainly covering detailed policy wording) in December 2013.

3.6 The Inspector issued interim findings on 15 January 2014. On the basis of available evidence, the Inspector found the Plan to be legally compliant and sound in key respects. This was encouraging, as many Local Plans across the country have been found to be unsound at that stage. Key elements which the Inspector identified were sound at that stage included:-

- The target of 8,100 net dwelling completions from 2010 to 2028;
- The overall amounts of land and selection of specific locations identified in the Plan for release from the Green Belt up to 2028; and,
- Proposals to extend the town centre boundaries in Kirkby and Prescott.

3.7 However, the Inspector also identified a limited number of critical issues which required attention, without which there was a risk that he would be likely to find the Plan to be unsound. These were reported in detail to the Cabinet on 18 June 2014 and are summarised in the table below:-

Issue	Inspector's Interim Finding (January 2014)
Short-term housing and employment development needs	<ul style="list-style-type: none"> • The "deliverable" supply of sites for housing development in Knowsley's current urban areas is insufficient to meet needs over the 5 years up to 31 March 2018. • There is an urgent need to identify sites for a high quality business park and for large scale distribution uses.

Green Belt	<ul style="list-style-type: none"> The Council needs to accelerate the release of areas of Green Belt (previously identified in the Plan submitted in July 2013 as "reserve locations" for long-term release) to meet the needs identified above.
Plan period employment development needs	<ul style="list-style-type: none"> The target in the Plan submitted in July 2013 of 183.5 hectares of land to be developed for employment uses is too high; a more realistic target is around 160 hectares.
Developer contributions and affordable housing	<ul style="list-style-type: none"> The Council should consider additional guidance concerning the relative priority to be given to the requirements for developer contributions in cases with viability issues. The Council could reconsider the 25% affordable housing target and the degree of flexibility in the tenure mix of affordable housing which is sought.

3.8 On 18 June 2014, the Cabinet considered the means to address the Inspector's points and agreed to:-

- Accelerate the release of all of the sites previously identified in the Plan as "reserve locations" for long-term release from the Green Belt and identify these instead as Sustainable Urban Extensions to be released from the Green Belt upon adoption of the Plan;
- Reduce the affordable housing target to be applied to proposals for market sector housing in current urban areas from 25% to 10% (with the target for sites being removed from the Green Belt remaining at 25%) and for these target levels of provision to remain subject to consideration of development viability in each case; and,
- Make other detailed policy changes as outlined in a full schedule of modifications to the Plan.

4. THE RECONVENED HEARINGS IN JULY 2014

4.1 The Inspector held reconvened hearings (as part of the ongoing Examination in Public of the Plan) in The Venue (previously the Huyton Suite) on 22-23 July 2014. The July 2014 hearings initially considered the implications of any changes in circumstances since the previous hearings (in November 2013), such as any new evidence which had become available or changes to Government policy. They then went on to consider the suitability of the Council's proposed modifications to the Plan (as agreed by the Cabinet on 18 June 2014 and set out in paragraph 3.8 above) before these were made subject to wider public consultation.

4.2 *Changes in Circumstances since the November 2013 Hearings*

4.2.1 The July 2014 hearings considered the implications of the 2012 based population projections (published by the Office of National Statistics in May 2014). These indicate a slower rate of projected future population growth in Knowsley than previous projections. However, the Council argued at the July 2014 hearings that the reduced population projections should not lead to a reduction in the target for new housing development in the Plan. This is because, for example, meeting unmet needs by providing a better choice of housing (and therefore changing rather than simply reflecting existing trends) is a key objective of the Plan.

4.2.2 The July 2014 hearings also considered the implications of the Government's on line Planning Practice Guidance, which was published in March 2014. This new guidance clarifies (for example) that:-

- Where there has (as is the case in Knowsley) been a shortfall of housing delivery since the start of the Plan period, this must be made up where possible within the first 5 years. This is in addition to the required flexibility factor of up to 20% over the 5-year supply which has been previously reported to the Cabinet;
- Plan policies regarding housing land delivery must take more specific account of market indicators, such as trends in prices, rental levels, and past under-delivery; and,
- The employment land supply in the Plan must take account of the needs of all employment sectors.

4.2.3 The points arising from the new Planning Practice Guidance serve to exacerbate the current shortage of short-term land supply for housing and employment development in Knowsley. They therefore further strengthen the need for early release of the previously identified "reserve" locations from the Green Belt for housing and specific employment uses as agreed by the Cabinet in June 2014.

4.3 *Suitability of the Council's Proposed Modifications (as approved by the Cabinet in June 2014)*

4.3.1 At the July 2014 hearings, the Inspector appeared to be broadly content with the Council's proposed modifications to the Plan. However, the discussions identified a need for further (mainly detailed wording) changes to some aspects of the Plan as described in section 5 of this report below.

4.3.2 To address the issues which were raised, the Council provisionally submitted details of potential further changes to the Plan on 11 August 2014. The Inspector subsequently issued a further "interim findings" document on 14 August 2014 (attached at Appendix A to this report). On the basis of current evidence, the Inspector's Second Interim Findings confirm that the modifications approved by the Cabinet in June 2014 (as revised by the further modifications for which Cabinet approval is now sought as discussed in section 5 of this report) are sound.

4.3.3 In particular, the Inspector's Second Interim Findings reaffirm the need to allocate all of the areas previously identified for long-term release from the Green Belt up to 2028 as Sustainable Urban Extensions, i.e. to be released from the Green Belt upon adoption of the Plan instead. Indeed, updated figures on housing land supply presented to the July 2014 hearings emphasise this requirement and that there is no option to progress to a sound Plan without taking this approach.

5. THE PROPOSED FURTHER MODIFICATIONS

5.1 To address the Inspector's Second Interim Findings and progress the Plan towards adoption, formal Cabinet approval is now sought for the provisional further changes to the Plan which were discussed at the July 2014 hearings.

5.2 An updated schedule of the further proposed modifications (incorporating the points raised by the Inspector in his Second Interim Findings) has been drawn up, and the key elements are summarised below. A full schedule (which is over 40 pages long) is set out at Appendix B, copies of which have been placed in the Members' Rooms. The document is also stored within the library on the Council website. Copies are available to all Members electronically and on request from Democratic Services.

5.3 In common with the modifications agreed by the Cabinet on 18 June 2014, the further changes comprise a mix of "main" modifications (which are needed if the Inspector is to find the Plan sound are discussed in more detail below) and "additional" modifications (which are more minor and cover for example updating of facts within the Plan).

5.4 *"Safeguarded Land" to the South and East of Knowsley Village*

5.4.1 The land to the south and east of Knowsley Village is proposed to be "safeguarded" for housing development beyond 2028 (with a capacity of just over 1,000 dwellings). The modifications approved by the Cabinet on 18 June 2014 proposed that, although the "safeguarded" land at Knowsley Village would not be allocated for development before 2028, there should be flexibility to bring its development forward to an earlier date if necessary to ensure a continued 5-year deliverable land supply for development. At the July 2014 hearings, the Inspector did not agree that this flexibility was justified, as sufficient contingency in the housing land supply to meet needs up to 2028 already existed in the Plan on other sites.

5.4.2 It is therefore recommended that the wording of the relevant policy of the Plan (Policy SUE1) should be changed to exclude the flexibility for this land to be developed before 2028, i.e. this site will remain as safeguarded land for development after 2028. This will give developers and the local community further certainty that this site will only be developed after 2028 (unless a future review of the Local Plan proposes otherwise).

5.5 *Master Planning of the Sustainable Urban Extensions*

5.5.1 The three largest of the Sustainable Urban Extensions are at South of Whiston/Land South of M62, East of Halewood, and Knowsley Lane, Huyton. These sites are all of very significant scale and the site at South of Whiston/Land South of M62 is currently owned by a wide range of different landowners. The modifications approved by the Cabinet in June 2014 aimed to ensure that the landowners involved in these three Sustainable Urban Extensions would co-ordinate with each other to ensure that a single (rather than piecemeal) approach is taken to the development of each of these sites. The policies also aimed to ensure that a comprehensive approach is taken towards requirements for developer contributions to help to fund and deliver any necessary improvements to transport, utilities, greenspaces, schooling, local retail provision, and other infrastructure.

5.5.2 The Inspector's Second Interim Findings support the Council's case at the July 2014 hearings in relation to these large sites, which is that it is essential that the sites are developed in accordance with a single comprehensive master plan. However, he identified that changes to the wording of a policy (Policy SUE2) should be included to ensure that such master plans are agreed by the Council and may be submitted at the same time as or before specific planning applications for development within the sites. The proposed further modifications also include other detailed policy wording changes related to these and other Sustainable Urban Extensions. It is recommended that the Inspector's suggested wording for policy SUE2 in his Second Interim Findings (see Appendix A to this report) should be included.

5.5.3 A further proposed modification affects the proposed Sustainable Urban Extension at Knowsley Lane, Huyton (which was proposed for development comprising at least 17.5 hectares of employment uses and approximately 100 dwellings). Following the provision of further information during and after the July 2014 hearings by Persimmon Homes (which has an interest in developing part of this site) and Knowsley Estate (the current owners), it is proposed to reduce the employment element on this site slightly to 16 hectares.

5.6 Other proposed further modifications include:-

- Clarification in Policy CS3 "Housing Supply, Delivery and Distribution" that the shortfall of housing delivery since 2010 will be included in the required 5-year deliverable land supply of land for housing development in addition to the 20% flexibility buffer previously required by Government policy (see paragraph 4.2.2 above);
- Clarification that the target for employment land development in Policy CS4 "Economy and Employment" (which is now 164 hectares between 2010 and 2028) will operate as a minimum;
- Clarification (in Policy CS15 "Delivering Affordable Housing") that, when considering the mix of affordable housing to be provided as part of market sector schemes, the fact that intermediate/shared ownership housing is often more economically viable to provide than affordable rented provision will be taken into account; and,
- Minor changes to other policies, mainly to update key facts, to clarify their detailed operation, and/or to ensure internal consistency between different parts of the Plan.

5.7 The Cabinet is recommended to approve the further modifications so that these can be incorporated into the Plan (alongside the changes agreed by the Cabinet on 18 June 2014). All of the modifications will then be made subject to a fresh public consultation exercise (see "next steps" in section 6 below).

6. NEXT STEPS

6.1 Subject to the Cabinet's approval of the further modifications, the next stages in preparing the Plan are likely to be as follows:-

1. Public consultation on all of the proposed modifications (i.e. those agreed by the Cabinet on 18 June 2014 and the further modifications set out in Appendix B) for an 8 -week period from mid/late September 2014 until mid-November 2014;

2. Receipt of the Inspector's Final Report (December 2014/January 2015); and,
 3. Council adoption of the Plan (including a report to the Cabinet followed by a recommendation to a full meeting of the Council to adopt the Plan - early 2015).
- 6.2 Risks remain in relation to the timetable above. For example, if the public consultation exercise (step 1 above) gives rise to new issues which have not been considered in previous stages or new evidence emerges affecting the approach in the Plan, it may be necessary for further hearings and consultation on further changes to the Plan to take place to address the issues raised. Such actions would need to take place before the Inspector could issue his final report (step 2 above) and could potentially cause a delay of several months in the subsequent adoption of the Plan.
- 6.3 The date on which full Council approval to adopt the Plan will be sought (step 3 above) depends on the timing of receipt of the Inspector's Report (step 2). At present, it is possible that the matter may be considered by the Council either on 28 January 2015 or on 25 March 2015. The Inspector is only likely to be able to confirm the proposed delivery date of the Final Report (step 2) following the proposed consultation on the modifications, at which point the level of response and whether any new issues have been raised (which could impact on the timescales) will be clearer. If it is possible to seek approval to adopt the Plan at the Council's meeting on 28 January 2015, it may be necessary to arrange a special Cabinet meeting shortly beforehand to enable the Cabinet to consider the matter before deciding whether to recommend adoption of the Plan to the full Council.
- 6.4 A key priority for the Council over the next 12 months remains to progress the Core Strategy to adoption. However, as well as undertaking this and other related work (such as the Local Plan: Monitoring Report), the Council is preparing various Supplementary Planning Documents.
- 6.5 The proposed Supplementary Planning Documents include (most significantly for this report) those which will guide the master planning of the three large Sustainable Urban Extensions at: Knowsley Lane, Huyton; East of Halewood; and South of Whiston/Land South of the M62. These Supplementary Planning Documents are likely to be of significant interest to the local communities affected by these proposals, as they will set out a broad framework for the development of each site. It is therefore proposed to provide substantial levels of consultation with the local communities and other stakeholders. It is expected that this process will broadly take place as follows:-

- Initial views invited on the scope of the Supplementary Planning Documents for each of the three large Sustainable Urban Extensions - September to November 2014;
- Consultation on draft Supplementary Planning Documents – February to March 2015; and,
- Council adoption of the final Supplementary Planning Documents – July 2015.

6.6 A Developer Contributions Supplementary Planning Document and various other Supplementary Planning Documents (for example covering design of different types of development) are also being prepared to various timescales over the next year. Following adoption of the Core Strategy in 2015, a key focus of the work will shift to preparing the Local Plan: Site Allocations and Development Policies.

7. RESOURCE IMPLICATIONS

7.1 Financial

7.1.1 The Local Plan is likely to have significant long-term financial benefits for the Council, for example by encouraging regeneration and investment, promoting population retention/growth, and therefore benefitting the Council Tax and Business Rate base and supporting future allocations of New Homes Bonus. Further details of these and other implications related to the Local Plan were set out in the report to the Cabinet on 18 June 2014. The further modifications for which approval is now sought are likely to increase the certainty of these financial benefits being achieved, as they will increase the level of certainty that the Council will achieve a sound Plan which can be adopted.

7.1.2 As previously reported to the Cabinet, there are costs to the Council in progressing the Core Strategy through its remaining stages to adoption, for example the costs of further consultation exercises and the ongoing Examination in Public. Sufficient funding exists within the Council's previously established reserves to meet these costs.

7.1.3 To develop the Supplementary Planning Documents to guide development of the proposed Sustainable Urban Extensions (as referred to in paragraph 6.5 above), use is being made of reserves established to develop Knowsley's Growth Plan.

7.2 Human Resources

There are no direct human resource implications arising from this report.

7.3 Information Technology

There are no direct information technology implications arising from this report.

7.4 Physical Assets

The Local Plan will guide the future use and development of land in Knowsley, including the Council's own land and buildings. As reported to the Cabinet on 18 June 2014, a small part of the land in the South of Whiston site which is being removed from the Green Belt for new housing development (comprising about 14.29 of the 110.3 hectares total area) is in Council ownership. The Council-owned land includes the Fox's Bank Lane Cemetery and adjacent land. The proposed further modifications for which approval is now sought will help to ensure that a single comprehensive master plan is developed and implemented for this Sustainable Urban Extension as a whole, including the Council owned area.

8. PERFORMANCE AND RISKS

- 8.1 The Council has a statutory duty to prepare the Local Plan. The process continues to carry significant risks, including the need to ensure that the Core Strategy is found to be "sound" by the Inspector following the completion of the current Examination in Public. If the Plan is found "unsound" at this late stage, the Council would need to withdraw the current Plan, and then prepare a new Plan so that this can be submitted for Examination. This process would involve a huge delay of several years and additional costs of potentially several hundred thousand pounds.
- 8.2 The further modifications for which approval is now sought will help to address these risks by responding to points raised by the Inspector following the reconvened hearings. They will therefore maximise the chances that the Inspector will find the Plan to be sound. This will in turn enable the Council to adopt the Plan and thereby establish an up to date policy framework for the development of Knowsley and for considering planning applications.
- 8.3 When the Plan is adopted (which is expected to be in early 2015), any aggrieved parties will have a right to mount a legal challenge within a six week period following adoption under Section 113 of the Planning and Compulsory Purchase Act 2004, for example if a procedural requirement has not been met. These procedural requirements are complex and the Plan process will continue to be managed effectively to minimise this risk.

9. EQUALITY AND ENVIRONMENTAL ASSESSMENT

9.1 Equality and Diversity

- 9.1.1 As set out in the report to the Cabinet on 18 June 2014, the Local Plan has been subject to robust processes of Equalities Impact Assessment, Health Impact Assessment, and Sustainability Appraisal as it has been prepared. These have detailed the impact of the emerging Plan policies on different population groups. The reports detailing the outcomes of these appraisals are available to view (as document references SD07 to SD10b in the Examination library at www.knowsley.gov.uk/localplan). These processes have sought to ensure that the positive impacts of the Plan on specific population groups are maximised while the negative impacts are mitigated through amendments to the Plan policies.
- 9.1.2 A further Sustainability Appraisal has been carried out in relation to the further modifications for which approval is now sought. The Appraisal found that the further changes are broadly neutral or positive in terms of their sustainability impacts.

9.2 Environmental Policy

- 9.2.1 The environmental impacts of the Plan have been assessed under the Sustainability Appraisal process referred to in paragraph 9.1.2 above (which also included a Strategic Environmental Assessment) and a separate Habitats Regulations Assessment.
- 9.2.2 The confirmation that the land at Knowsley Village is "safeguarded" for post-2028 development needs will have an environmental impact, as it will bring greater certainty that the impacts arising from the development of this site will occur after 2028 rather than during the Plan period. This is still a matter of timing, as the site is ultimately likely to be developed after 2028. Any potential adverse environmental impacts resulting from the future development of this site and the Sustainable Urban Extensions at other locations identified for development in the Plan period would be identified and mitigated where possible through the application of the Plan policies (e.g. related to design, biodiversity protection, and pollution control) and the proposed master planning process for the larger sites.

10. COMMUNICATION ISSUES

- 10.1 Subject to the Cabinet's approval of the further modifications set out in this report, it will be necessary for the Council to undertake a comprehensive consultation exercise. This will need to seek views on the soundness of all the modifications (including those agreed by the Cabinet in June 2014 and those recommended in this report). This consultation is likely to start in mid-September 2014 and will include a range of consultation methods, such as use of the Council's website, media releases, public notices, consultation events, site notices, and letters to residents who live close to the sites proposed for removal from the Green Belt.

- 10.2 Following the consultation exercise, the Inspector is only likely to give significant weight to comments which specifically address the modifications to the Plan. Any responses which raise matters which have already been determined in the Plan process are unlikely to be given significant weight. Respondents will therefore be advised to focus any representations specifically on the effect of the modifications on the legal compliance and/or soundness of the Plan. Guidance will be issued at the start of the consultation as to how they may do this. All responses received will be collated into a Report of Consultation which will be forwarded to the Inspector before he issues his final report to the Council.

11. CONCLUSION

The Knowsley Local Plan: Core Strategy is currently undergoing its Examination in Public by a Government Inspector. Following reconvened hearings in July 2014, a need for further modifications to some aspects of the Plan (to supplement the modifications agreed by the Cabinet on 18 June 2014) has been identified. The Cabinet is recommended to approve the further modifications, so that these can then be subject to the remaining stages of Plan preparation as set out in this report.

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Director of Regeneration and Housing

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Appendices:-

Appendix A Inspector's Second Interim Findings Following 2014 Hearing Sessions – 14 August 2014

Appendix B Knowsley Local Plan: Core Strategy – Proposed Further Modifications, September 2014

(Copies of Appendix B have not been circulated with the agenda but are available as set out in paragraph 5.2 of this report)

Background Documents:-

None

KNOWSLEY LOCAL PLAN: CORE STRATEGY EXAMINATION

INSPECTOR'S SECOND INTERIM FINDINGS FOLLOWING JULY 2014 HEARING SESSIONS

In January 2014 I issued interim findings on key soundness issues for the submitted Knowsley Local Plan: Core Strategy (KLPCS) following the examination hearings held in November 2013 (document EX26). In response, the Council has made further changes to the KLPCS which were discussed at reconvened hearings in July 2014.

At the reconvened hearings the Council undertook to prepare a schedule of further modifications to the KLPCS in light of the evidence given. This was published on 11 August 2014, together with a letter to me (documents CS08b and EX32). I indicated that I would set out my interim findings on the modifications made since November 2013 so that the Council could, if necessary, make further adjustments to the Plan before undertaking a consultation on all the modifications made to the Submission KLPCS.

I have considered carefully the statements submitted by the parties prior to the July 2014 hearings, the evidence given at the hearing sessions and the Council's schedule of further modifications. My interim findings on the main areas of change since November 2013 are that the following matters are sound:

1. The identification of Sustainable Urban Extensions (SUEs) and the removal of the phasing mechanism for the release of these sites for development.
2. The amendment to the treatment of safeguarded land.
3. The revision to the calculation of a 5 year housing land supply.
4. The approach to the employment land supply and delivery.
5. For affordable housing provision, the differentiation between urban sites and SUEs and the flexibility introduced into the assessment of tenure mix.
6. The revised approach to sustainable construction.
7. The approach to infrastructure delivery and developer contributions.

I have also reflected on the further representations relating to Green Belt sites proposed by landowners which are not included in the Plan, but I do not propose any additions to the sites selected by the Council.

There is one detailed matter in policy SUE 2 on which I am asking the Council to reflect further, and one small point where I think an error has been made; these are set out overleaf. These aside, I consider that none of the other changes to the plan that were proposed by representors at the reconvened hearings are necessary to ensure the soundness of the KLPCS.

Policy SUE 2

I question whether the revised approach to master planning of the three main allocations is wholly appropriate. I agree that the master plan process is a separate exercise from the SPD, and one which is likely to be carried out by the site developers, as was stated at the hearings. But I think it is still necessary for the Council to approve the single detailed master plan (as previously stated in SUE 2 clause 3), which will then serve (along with the SPD) as the overall, site-wide framework against which all detailed applications will be assessed. Unless the master plan is approved there could be uncertainty about its status and the potential for disputes.

As to the timing of the master plan, new SUE 2 clause 4 seeks a single detailed master plan to be "submitted with the application". This doesn't seem to allow for the master plan to exist before an application is submitted, which is likely to happen with subsequent applications that are made as development progresses. It may be that the master plan accompanies the first application for a particular SUE, in which case it can be approved at the same time as planning permission is granted, but the KLPCS should also allow for the situation where the approved master plan is in place prior to an application being lodged.

I have suggested below minor revisions to policy SUE 2 clause 4 which would address these matters, but other solutions are possible.

Proposals for development within each of these locations will only be granted planning permission where they are consistent with a single detailed master plan for the whole of the Sustainable Urban Extension which is approved by the Council. The master plan should be submitted with the application and accords with development plan policy and any associated Supplementary Planning Document and may be submitted prior to or with the application. Planning permissions must be linked to any necessary legal agreements for the improvement, provision, management and maintenance of infrastructure, services and facilities, open spaces and other matters necessary to make the development acceptable and which facilitate comprehensive delivery of all phases of development within the Sustainable Urban Extension in accordance with the single detailed master plan.

Knowsley Lane, Huyton

Modifications M060 and M071 refer to a reduced capacity for employment uses at Knowsley Lane from 17.5ha to 16ha. However, the August 2014 Further Modifications (CS08b) at Appendix 1- Delivery Mechanisms proposes for policy SUE 2a a change in employment land from 16ha to 17.5ha. It is assumed that this is an error, and that the change should be the other way round - from 17.5ha to 16ha.

Knowsley Local Plan: Core Strategy Examination

Finally, it is necessary to repeat the point I made in the January 2014 document, which is that these interim findings are based on the evidence submitted thus far. I can only reach my final conclusions on the soundness of the Plan after considering the representations received in response to the forthcoming consultation on the proposed modifications to the Submission KLPCS.

Martin Pike

Inspector
14 August 2014