

EX15

EXAMINATION HEARINGS

AGENDA

FRIDAY 8 NOVEMBER 2013 at 10.00 am

Matter 3 HOUSING PROVISION (continued)

Issue 3: Whether the KLPCS is sufficiently clear, effective and robust to ensure timely delivery of the proposed amount of housing development.

- 3.8 Has the Strategic Housing Land Availability Assessment (SHLAA) been prepared in accordance with current guidance?
Is there compelling evidence of specific SHLAA sites that do not meet the available, suitable and achievable tests set out in the NPPF?
Has the viability of housing sites been robustly assessed, particularly for sites in regeneration areas?
- 3.9 Are the density assumptions used in the SHLAA unduly cautious? KLPCS paragraph 5.24 refers to densities "up to 40 dph" being appropriate – is this an upper limit and if so, are there not some locations where higher densities would be acceptable?
- 3.10 Is a 20% discount for non-delivery of SHLAA sites appropriate?
Is it right to not take windfalls into account?
- 3.11 How much of the need for affordable housing is likely to be met, realistically, over the plan period?
What are the implications for the objective of re-balancing the housing market?
- 3.12 How exactly will the phased release of housing land be managed?
Will the SHLAA sites be subject to phased release and if so, what mechanism will be used?
Is the plan effective without the inclusion of a phasing mechanism as part of policy CS 3?
- 3.13 Is the housing trajectory realistic and deliverable? Does it demonstrate a reliable 5 year housing supply (including NPPF 20% buffer) and developable sites for years 6-10?

KLPCS paragraph 5.23 refers to potential review mechanisms if the trajectory is not delivered – what are these and why are they not included in the plan?

Matter 4 EMPLOYMENT PROVISION

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

- 4.1 Is the methodology used to determine the employment land requirement robust and consistent with the evidence?
Is a methodology based on historic provision realistic given that the highest uptake was prior to 2001, coupled with the prospect of limited public sector assistance in future?
- 4.2 Given the significant year-by-year discrepancies in historic employment land provision between previous studies and the latest Employment Position Statement (SD23), what confidence is there that the latest figures are a robust basis for future projections?
- 4.3 Is there justification for a 20% flexibility allowance being added to the employment land requirement to provide greater choice of sites?

Issue 2: Whether the broad distribution of employment development across the borough is consistent with the spatial strategy.

- 4.4 The location/distribution of employment land provision appears to be driven primarily by the availability of land and does not match the distribution of housing across the borough. Given the poor transport links between townships, does the distribution of new employment land accord with the overall spatial strategy?

Issue 3: Whether the KLPCS is sufficiently clear, effective and robust to ensure timely delivery of employment development and consistency with national policy.

- 4.5 Is the assessment of land available for employment robust and does it fully take into account the findings of the viability study?
Is there evidence of individual sites being wrongly categorised as deliverable?
Does the treatment of some parts of the employment land supply as expansion land for certain major businesses artificially boost the amount of land that is deliverable?

- 4.6 Does the floorspace available in vacant premises exceed the level normally regarded as necessary to enable "churn" to occur and, if so, what contribution does this make to the employment land supply?
How has the potential capacity from remodelling of underused sites been taken into account?
- 4.7 KLPCS table 5.1 records an employment land deficit of 23.5 ha to 2028, assuming the South Prescott planning permission for housing is implemented. The land proposed to be released from the Green Belt for employment purposes comprises substantially more than this deficit. What is the justification for this, and does it meet the exceptional circumstances test of Green Belt policy?
- 4.8 How exactly will the phased release of employment land be managed?
Will the sites which comprise the current supply be subject to phased release and if so, what mechanism will be used?
Is the plan effective without the inclusion of a phasing mechanism as part of policy CS 4?
- 4.9 Policy CS 4 refers to office uses in employment areas being subject to the sequential test, yet policy CS 11 encourages office uses in Knowsley Industrial and Business Park regeneration area with no such reference. There is a similar reference in policy CS 13 (South Prescott regeneration area). Is it intended that the sequential test to office development should apply in regeneration areas, consistent with national policy?