Knowsley Local Plan: Core Strategy Examination

Report of Representations Made – Responses to Additional Documents AD51 and AD52

August 2014
1. Introduction

1.1 This document sets out a copy of each of the Representations received to the additional documents published by the Council during July 2014. These documents are:

- AD51: South Whiston and Land South of the M62: Infrastructure and Development Options Study

1.2 The Inspector invited comments on these documents between 22 July 2014 and 11 August 2014. All parties with outstanding representations on the Core Strategy were notified directly of the arrangements for the consultation period. The documents were also placed on the Council’s website.

1.3 Six parties submitted representations during the consultation period. All representations were received by the Programme Officer via email.

1.4 This document sets out all of these representations, as copies of the form in which they were made. Personal details (including signatures, postal addresses, email addresses and telephone numbers) have been removed. Names of representors and the organisation they represent (if applicable) however must remain clearly visible.

1.5 The order of representations in this document is based on a method of standard coding applicable to all representations made to the Knowsley Local Plan Core Strategy to date. The system of coding is replicated across this document, the representation database, the Statement of Previous Consultation, and the Examination Library (where appropriate). This is based on a representor ID, which is a unique number from 1 to 120 identifying the party submitting representations to the Plan. This number is intended to remain unique to the individual / organisation concerned, throughout the Examination in Public. All documents submitted by the party should contain this consultee ID.

1.6 An index is provided to enable consultees to find their representations within this document.

1 The Planning Practice Guidance and National Planning Policy Framework are available to access via the Communities and Local Government website at: http://planningguidance.planningportal.gov.uk/
1. Representations Received

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05 August 2014

Dear Sir/Madam,

Re: Knowsley Local Plan Core Strategy Examination - Invitation for comments on Documents AD51 & AD52

Thank you for inviting the Marine Management Organisation (MMO) to comment on the documents detailed above. I can confirm that the MMO has no comments to submit in relation to this consultation.

If you have any questions or need any further information please just let me know. More information on the role of the MMO can be found on our website www.gov.uk/mmo

Yours sincerely

Angela Gemmill
Relationship Manager

E stakeholder@marinemanagement.org.uk
Mr Paul Morris  
Programme Officer  
Knowsley Local Plan Core Strategy Examination  
Municipal Buildings  
Archway Road  
Huyton  
Merseyside  
L34 9YU  

By post and email: programmeofficer@knowsley.gov.uk

Dear Mr Morris

COMMENTS ON THE INFRASTRUCTURE AND ECOLOGY STUDIES RELATING TO THE LAND SOUTH OF WHISTON

On behalf of Mrs A Percival, a landowner in Knowsley (Representor Reference: 9), this letter has been submitted to the Inspector to provide our comments on the following documents:

- AD51 – Infrastructure and Development Options Study (July 2014)
- AD52 – Phase 2 Ecology Survey & Habitat Assessment Report (July 2014)

The principle of the release of the ‘reserve locations’ from the Green Belt has already been found sound by the Inspector. Furthermore, our previous representations on behalf of Mrs A Percival provided justification for the Council’s proposed approach to converting all reserved locations to Sustainable Urban Extensions (SUE) in order to adequately address the need to demonstrate a five-year supply of deliverable housing land (plus a 20% buffer) as defined by paragraph 47 of the National Planning Policy Framework (the Framework). This letter will not repeat these arguments here. However, they remain valid and should be considered alongside this letter.

AD51 – Infrastructure and Development Options Study (July 2014)

The Infrastructure and Development Options Study (July 2014) prepared by Mott MacDonald clearly demonstrates that there is suitable capacity within the existing utilities infrastructure to accommodate an incremental housing development on land ‘South of Whiston’. Coupled with the land south of the M62, the Options Study also details the wider economic benefits of the overall SUE highlighting the potential for 860 Full Time Equivalent (FTE) jobs and approximately £48.7 million of Gross Value Added (GVA) to the local economy per annum; plus a further 278 temporary construction jobs during the build-out phase of both sites. The Options Study recommends that improvements to existing infrastructure are made to encourage the use of sustainable transport modes and that potential capacity issues on the local highway and motorway network will
require further assessment. Both of these wider transport and highway matters can be adequately addressed through the masterplanning / SPD process with individual applications providing appropriate contributions where necessary.

**AD52 – Phase 2 Ecology Survey & Habitat Assessment Report (July 2014)**

The Phase 2 Ecology Report (July 2014) prepared by Merseyside Environmental Advisory Service builds on the extended Phase 1 work undertaken in October 2013. The Report provides the results of a number of detailed surveys and recommends that various high value priority habitats on-site are retained where possible. It is considered that this process of retention can be undertaken through the masterplanning / SPD process following the standard ‘avoid, reduce, mitigate, compensate’ hierarchy as set out in the Framework.

**Masterplan / SPD**

As detailed in previous representations, the use of masterplans and associated Supplementary Planning Documents to guide the development of this particular site is considered the most appropriate option. This large site is complex in nature with multiple ownerships and additional infrastructure requirements to support its delivery. This complexity justifies the preparation of an SPD to ensure a comprehensive and sustainable development is secured. This is also justified by the fact that an SPD would provide the most certainty that the site can deliver housing in the short term in order to contribute towards the Council’s five-year supply of deliverable housing land. This will ensure that the Plan is sound.

**Summary**

In summary, both technical documents demonstrate that there are no infrastructure or ecological issues that would prevent the development of the site in the short term. Where recommendations are made, these can be adequately addressed at the masterplanning / SPD and application stages.

I trust that these comments will be taken into account when progressing with the Examination of the Local Plan.

Yours sincerely

MATTHEW ROBINSON
PLANNER

Direct Line: [Redacted]
Email: [Redacted]

CC. Mrs A Percival (by email only)
Dear Mr Morris

Thank you for consulting Natural England on the above consultation. Natural England has no comment to make.

Thank you

Kind regards

Kate

Kate Wheeler
Lead Adviser
Cheshire, Greater Manchester, Merseyside & Lancashire Area

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Subject: FW: Comments on AD51 and AD52
Attachments: Indicative Site Masterplan (OS context).pdf; Site Location Plan.pdf

Paul

Thanks for your note.

I am about to go on holiday tomorrow for 2 weeks (returning 18 Aug) so I will keep this very brief and reserve the right to make further comments at a later stage if necessary.

My initial comments are as follows:

AD51 – Infrastructure and Development Options Study

Having reviewed this I am broadly relaxed about its findings with the exception of the ‘suggested’ order of site development/phasing at South Whiston described at paragraphs 6.1.4 and 6.1.5, and illustrated at Appendix G.

Two obvious priorities which should drive/inform the phasing of this site are to (i) accelerate the delivery of housing to meet the 5 year shortfall and boost supply generally; and (ii) evenly spread the traffic generated. Therefore, Site 8 (Appendix G) should be phased simultaneously with sites 1 to 4 and 5 to 7. The geographical disposition of the sites and their independent access points to the north/east/west site boundaries clearly lends to this. The suggested phasing should reflect this.

AD52 – Phase 2 Ecology Report

I note the findings and specifically the limited ecological constraints relating to our client’s land ownership (as per attached Location Plan). According to the plan at Appendix 1 both parcels of land are relatively free of constraints. The smaller parcel is totally unconstrained. Any constraints relating to the larger parcel fronting Fox’s Bank Lane are isolated to the ‘Fox Clump’ area only which we have already acknowledged/safeguarded within our own initial master plan exercise (see attached). This therefore helps to inform the Council’s SPD/Masterplan process and underlines the importance of allowing both parcels of land to come forward quickly for residential development.

Should I have any further comments to make before 11 August I shall let you know.

Regards

Andy Frost
Frost Planning Ltd

Email: 
Web: www.frostplanning.com

Frost Planning Limited is a limited company registered in England and Wales. Registration number: 7877771. Registered office: Drumlins, 57 Chelford Road, Prestbury, Cheshire, SK10 4PT

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These documents provide useful and important information which will inform masterplanning, the delivery of infrastructure and the phasing of development at South Whiston and Land to the South of the M62.

The documents show the many challenges that surround the delivery of development at these strategic locations and highlight the degree to which development will be constrained. In this respect the documents add weight to significant arguments that we have consistently made in response to the Knowsley Local Plan Core Strategy. It can be seen that reasonably small scale logistics uses can be accommodated on land to the South of the M62. The constraints will limit the extent to which larger scale operations will be attracted. We believe that, because of this, there remains a gap between the demand for large scale logistics and the supply of appropriate employment land through the Plan period.

As was stressed at the Hearings, a significant need for large scale logistics will arise to meet the demands associated with the Liverpool City Region Superport. Knowsley will miss an opportunity for significant investment if suitable land in the right place is not made available at the right time. This is why we have consistently promoted land at Axis Business Park as a potential large scale employment site which is available now, fully serviced, in single ownership and without constraints.

We strongly encourage an urgent review of the demand for logistics sites arising from Liverpool City Region Superport. We understand that this review will be by way of a sub-regional study. We further understand that the outcome of the review could lead to a need for the release of other land from the Green Belt at strategic locations in Knowsley appropriate for the logistics sector. If this is the case then an early review of the Local Plan will be triggered. (This is based on the outcome of the summary document ‘Market Analysis: Land and Property, Liverpool City Region Superport’ (March 2014). It would be extremely useful if the full report could be made available at this stage as it will influence employment land supply in the Liverpool City Region over the next 20 years).

The land to the South of the M62 could play an important role in meeting employment needs. Before this is realised, however, the challenges associated with infrastructure provision will need to be overcome. There is likely to be a long lead in time before serviced development land is made available at this location on the strategic road network. In advance of this land being made available for development and whilst the sub-regional review of the Liverpool City
Region Superport is taking place there is a strong likelihood that potential investment and job creation in Knowsley will not be realised.

We have promoted Axis Business Park as a different offer next to the strategic road network. It is capable of meeting different needs for employment development in Knowsley which could go to other local authority areas, including those outside the Liverpool City Region, if a supply of large, high quality sites suitable for logistics is not identified.
1 Introduction

1.1 This short statement is Barton Willmore’s response to the opportunity given by the Inspector for comments on the following documents which were submitted by the Council immediately before the start of the reopened hearing sessions:

- AD51: South of Whiston and Land South of M62 Infrastructure and Development Options Study
- AD52: Phase 2 Ecology Report for South of Whiston and Land South of M62.

1.2 We have restricted our comments to those matters raised by the Inspector’s hearing questions which mainly relate to the principle and deliverability of the two sites. For the record, we have concerns about some of the technical detail in the two reports but these are not relevant to the Core Strategy.

2 AD51: Mott MacDonald Infrastructure and Development Options Report

2.1 As the Mott MacDonald report itself confirms, it is a “high-level” study, and much more detailed work is required at the stages of master planning and planning
application before final conclusions can be drawn on the exact infrastructure needs of the two proposals. However the Mott MacDonald report does confirm the following of significance for the Core Strategy:

- Both Knowsley and the wider sub-region will benefit from the development of the two schemes. The sites together have a capacity to deliver approximately £48.7 million of GVA per annum (page iii and 8.3.11).

- The development of the site South of the M62 (when complete) will create significant new employment in Knowsley, including 859 FTE jobs on-site and a further 258 “indirectly induced” by the development (Table 6.3 page 76).

- Both sites can be connected to the utilities required for the form of development proposed (8.2.3).

- For South of Whiston, all utility services are available. Although network enhancement is required for electricity, gas, and potentially for potable water supplies, this can be provided at reasonable cost (8.2.4 and Table 6.1). United Utilities has confirmed that capacity for the proposal is available within the 1000mm diameter combined sewer in Lickers Lane (8.2.5). Surface water disposal is no difficulty as gravity drainage to existing watercourses is feasible (8.2.6).

- For South of the M62, foul water drainage can be provided by an on-site treatment plant discharging to watercourse. This has been confirmed as acceptable in principle by United Utilities (3.3.19 and 8.2.9). There may be a need for reinforcement of existing electrical and water supply networks but this is achievable within reasonable cost (8.2.10, 8.2.11 and Table 6.1).
• A £100 million electrification scheme is currently being undertaken by Network Rail for railway lines in the North West, including the Chat Moss line which has a stop at Whiston Station just to the north of the South of Whiston site. This electrification will significantly reduce journey times to Liverpool and Manchester (3.2.18).

• Access to the external highway network can be provided from Windy Arbor Road, Lickers Lane and Fox’s Bank Road (5.2.2, 5.2.4 and 5.2.5).

2.2 These findings can give confidence to the Inspector about the appropriateness and deliverability of the proposals for South of Whiston and Land South of the M62.

2.3 The Mott MacDonald report also helps to inform the discussion which took place at the reopened hearings about the appropriateness of the 25% affordable housing target for the Green Belt exclusion sites. The Council justified this target by reference to the Keppie Massie Study. We pointed out that this study was not compliant with NPPF paragraphs 173 and 174 as it did not seek to establish that “the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing landowner and willing developer, to enable the development to be deliverable.” We pointed out that the Keppie Massey study (pages 186-188) only looked at the impacts on viability of individual policy requirements, not the aggregate of requirements as national policy says should be the case. We also made the point that the larger Green Belt exclusion sites such as South of Whiston and East of Halewood would have very significant infrastructure requirements which were not adequately taken into account by the Keppie Massey Study. In partial response, the Council said that the Keppie Massey Study did include an allowance for infrastructure (including Section 106 payments). Table 7.1 of that Study (page 127) shows that an allowance of
£7500 per dwelling was made. The Mott MacDonald Report supports our view that this “allowance” is a considerable under-estimate of the likely costs. Table 6.1 of the Mott MacDonald shows infrastructure costs of £15,300,394 for an 1800 dwelling scheme (which includes the Council’s land). This is an average of £8500 per dwelling. Moreover there will be other significant infrastructure requirements which have not been costed by Mott MacDonald, including off-site highway works (such as to the Tarbock Island junction), and education and open space payments. Appendix F (penultimate page) of the Mott MacDonald Study confirms that these costs have not been included in their estimates. Although no exact figures can yet be given, these further costs are unlikely to be less than £5 million given the size of the proposal, thereby generating a total infrastructure cost of not less than £20,300,000 which is equivalent to over £11,200 per dwelling. As the Keppie Massey report shows, such a level of infrastructure costs would not be viable with a requirement for 25% affordable housing. In conclusion, we consider that the Council has not demonstrated in line with the NPPF (paragraphs 173 and 174) why a higher requirement for affordable housing should be made for Green Belt exclusion sites (given their very considerable infrastructure requirements) compared with other greenfield sites where there would be much lower infrastructure costs.

2.4 The internal phasing of the development is not a matter for the Core Strategy. However, for completeness, we must note that the proposed phasing of the South of Whiston scheme set out in paragraph 6.1.5 is not consistent with the Council’s aspiration for housing delivery from the site which is 150 dwellings per annum from the outset of development. To secure such a high rate, there would need to be multiple selling points which would require separate accesses from Windy Arbor Road, Lickers Lane and (probably) Fox’s Bank Lane. It could not be secured by a single access in the south-west corner of the site as suggested by the report’s proposed phasing. Moreover the Mott MacDonald report says that the phasing
arrangements should be driven by the locations of outfalls for foul drainage (8.2.5). In this respect, the report also makes clear that the development will have to drain to the 1000mm diameter combined sewer in Lickers Lane which is on the northern boundary of the site (8.2.5). This is not consistent with a first phase in the south-west corner of the site. We must also note that the Mott MacDonald report expressly states that there are major planning drawbacks with its proposed phasing arrangement. Paragraph 6.2.2 says:

“The phased construction from the south-west of the South of Whiston site towards the north and east would limit access to public transport services (Whiston Station) and local facilities on Lickers Lane if the provided highway infrastructure was constructed in relation to the construction phases.”

2.5 In conclusion we consider that the site should be differently phased so that there are early phases from both Lickers Lane and Windy Arbor Road. This arrangement would maximise the early delivery of housing from the site which is essential to address five year supply issues. It would also allow an early link to be established between the south and north of the site, with significant sustainability benefits including effective bus penetration and creation of walking and cycling routes to local facilities which are mainly located to the north of the site, including Whiston Station. However we must emphasise that this is a matter essentially for the SPD and the planning application, not for the Core Strategy.

3 AD52: Merseyside Environmental Advisory Service Part 2 Ecological Survey and Habitat Assessment Report

3.1 We have few comments on the MEAS report. Although we consider that it somewhat exaggerates the ecological value of some of the habitats on the sites, we note that the report raises no objection in principle to the development of
either site or their potential to deliver the scale of development which is suggested by the Core Strategy.

3.2 Our ecological consultants will comment in detail on the MEAS report as part of the SPD preparation exercise.