



**SMITHSGORE**

ID Reference 72  
Smiths Gore on behalf of  
The Knowsley Estate  
Matter 1

## **Knowsley Local Plan Core Strategy Examination**

### **Matter 1: New Matters arising since November 2013 Hearings**

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## **Knowsley Local Plan Core Strategy – Re-convened Examination Hearings**

These representations are submitted on behalf of The Knowsley Estate and are in response to the Submitted Knowsley Local Plan Core Strategy and matters arising since the November 2013 Hearings. The submitted representations seek to address the Matters and Issues identified by the examination Inspector as set out below.

Overall it should be noted that the Knowsley Estate broadly support the plan and its overall strategy and there is little difference between the Council and our client. However, where there are differences these relate to the core strategy's ability to respond appropriately to the need to deliver housing and employment land in a timely manner and in a manner consistent with the National Planning Policy Framework's (NPPF) requirement to meet the full objectively assessed need for market and affordable housing in the housing market area and to "boost significantly the supply of housing" (NPPF para. 47).

The Knowsley Estate owns land within the Knowsley Local Plan area and there are three sites under the Estate's ownership which have been assessed and reviewed through the Council's Green Belt Technical Report. These sites have been assessed by the Council as being suitable for Green Belt release and our client concurs with this view. Our client is committed to bringing forward these development sites to support the housing and employment land needs of the borough and is pleased to be working with the Council to secure the delivery of these sites. The land owner envisages these sites will bring forward high quality and inclusive design as sustainable developments to the benefit of the area, its residents and visitors.

## **Matter 1: 2012-based Populations Projections**

*Issue: 1.1 What are the implications of the new population projections for the objectively assessed need for housing in Knowsley borough?*

We continue to support the Council's focus on delivery of new homes to meet existing identified needs and demands, to retain existing residents and to attract more residents to the Borough.

It is considered that the inclusion of the ONS 2012-based sub-national population projections for the period 2012-2017 should form part of the evidence base for the Examination to ensure that the housing numbers are objectively assessed in line with the requirements set out in the NPPF. As such, whilst Document SD31 states that the outcome of the 2012 household projections will not be available until after the Core Strategy is adopted, the Council should ensure that the population projections are fully assessed as part of the final housing figures.

The Council should continue to adopt a positively prepared approach and plan for additional housing if there is a possibility that future evidence will identify a greater demand during the plan period, if this future scenario could be reasonably expected to occur.

If the Inspector considers that the annual delivery target should be amended to reflect this new evidence then we will support the Inspectors finding and would like to work closely with the Council to ensure enough housing sites are brought forward to ensure that the Plan can be found sound.

## **Matter 1: Planning Practice Guidance**

*Issue: 1.2 What are the implications of the use of market signals (house prices, rents, affordability, rate of development and overcrowding) for the assessment of housing need? Does information on changes in market signals over time reveal any imbalances between the demand for and supply of housing which are not already addressed in the KLPCS?*

Market signals should form part of the methodology when the Council objectively assesses the development needs in the area; however, it is not the only approach to assessing housing need.

As set out in the NPPG, a worsening trend in any market signals will require upward adjustment to planned housing numbers compared to ones based solely on household projections.

Whatever the outcome of recent market signals, the Authority should plan positively to ensure that the housing need and demand is met during the Plan period.

*Issue: 1.3 Is the approach to the past under-supply of housing consistent with PPG advice? If the post 2010 backlog is included in the five year land supply calculation, as suggested by some representors, is there a reasonable prospect that the resulting target is realistic and achievable?*

As a starting point, it is considered appropriate and in line with national policy and guidance, including past Inspector's reports and appeal decisions to rely on the Sedgfield approach whereby the unmet need is accounted for in the first five years of the Plan period.

The NPPG recommends that where allocations are proposed, 'sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development'. The NPPG also states that if sites are available and can be justified for early release where needed, then such sites should be released for development.

As such, whilst we fully support the proposed allocations and safeguarded sites identified in the Plan, particularly Knowsley Village, Knowsley Lane, Huyton and East of Knowsley Industrial and Business Parks, it is essential that flexibility is incorporated into the Plan to enable sites to come forward as and when demand requires.

We therefore support the deletion of these sites from the Green Belt. Policy SUE1 provides the flexibility to bring land at Knowsley Village forward during this Plan period if there is a need to maintain a five year delivery supply of sites or if there is an identified lack of available sites during the plan period. The release of Green Belt land by allocation is fully supported and will help support the required housing delivery. However, we do question the delivery mechanism. Greater clarification with regard to how the safeguarded site can be brought forward is needed. The table on page D21 of the 'tracked changed' Core Strategy Submission Document, identifies the safeguarded site to come forward as an allocation, however, how this is to occur is not clear. Does the Council propose a review of the Plan on a regular basis during the Plan period? Further clarification on this matter is essential to understand delivery rates etc. and how the early delivery of the Knowsley Village site will occur if needed.

Any housing shortfall should be accommodated in the first five years of the plan period, and as previously stated, we see no clear reason as to why this cannot be achieved. If there is therefore a need to bring forward additional land to address any shortfall (which may be identified by revisiting calculations associated with addressing the post 2010 backlog – further clarification is needed here) then we fully support the early delivery of Land at Knowsley Village to help meet the target and ensuring the delivery of housing is realistic and achievable.

## **Matter 1: Employment Land Study**

*Issue: 1.4 In light of the new information, what is the robust figure for the supply of employment land?*

*Issue: 1.5 Does the identified land supply pay sufficient regard to the needs of different market sectors?*

We continue to support the identification of land East of Knowsley Industrial and Business Park, Kirkby and we fully support the modification which illustrates the deletion of land from the Green Belt to a designated Sustainable Urban Extension for employment use.

Whilst we do not have any comments on the figure for the supply of employment land, we continue to stress that, the release of sites for development, and the timing of such delivery, are imperative. As such, whilst sites have been identified for allocation during this plan period, it is important that the plan is proactive and forward planning rather than just being reactive.

We therefore support the amendments to Policy CS4 which no longer restricts land to be developed for employment uses during the plan period to be initially located within the urban area. The amendments to Policy CS4 (criterion 2) provide the flexibility needed to find the policy wording sound with regard to distribution and provision of employment uses.

**Matter 1: Any other Matters Arising Since November 2013 Hearings**

*1.6 Are there any other new matters relevant to the KLPCS?*

It is considered that there are no additional matters arising following the November 2013 Hearings.