



Knowsley Local Plan: Re-Convened Core Strategy Examination

**Written Statement
Relating to Matter 2
(Questions 2.1-2.14)**

In respect of
Land off Fox's Bank Lane, Whiston
(In Support of Release of Sites from the Green Belt
and Reallocation for Residential Development)

July 2014

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1 Introduction

1.1 Purpose

This Written Statement has been prepared by Frost Planning Ltd in connection with the Re-Convened Examination Hearing of the Knowsley Local Plan Core Strategy ('KLPCS').

It specifically addresses the Inspector's Questions (2.1-2.14) outlined in the Provisional Hearing Agenda concerning 'Council's Response to Inspector's Interim Findings'.

1.2 References

This Written Statement relies upon and should be read in conjunction with the documents constituting the Examination Library.

2 Response to Questions 2.1-2.14

2.1 Question 2.1

The designation of Sustainable Urban Extensions (SUE) and the omission of a phased approach to their release is the right strategy to adopt.

This approach is supported by the evidence from the Hearing Sessions in November 2013 and the Inspector's Interim Findings published in January 2013.

The Council's original logic for devising 'reserve locations' was to enable a range of sites to be released for development 'as and when needed'. However, by definition these are sustainable urban extensions and there is clearly an immediate need to release these sites from the Green Belt 'now'. The reasons being:

- The Council is currently unable to demonstrate a 5 year 'deliverable' housing land supply.
- The 5-year shortfall is likely to significantly worsen in 2015/16 and over the next 10 years unless the Council is able to draw down 'without delay' from the SUE sites.
- The immediate release of 'SUE' sites will immediately correct the 5 year supply and ensure a 5 year continuous supply is maintained throughout the Plan period.
- Uncertainties over the rate at which the SUE sites will be delivered and their ultimate capacity, and hence the need for 'headroom' both now and throughout the Plan period.
- To give certainty and accelerate the re-balancing of the housing market and provision of homes for working-age families. This will more rapidly stem out-migration and secure the inward economic investment needed in Knowsley.
- Help to clear more quickly the backlog of affordable housing provision across the borough.
- The policy constraints outlined in new Policy SUE2 (Sustainable Urban Extensions – Development Principles) will mitigate for the loss of the phasing mechanism under Policy CS5 by ensuring that sites are brought forward in a controlled manner, including the use Supplementary Planning Documents where necessary (note: SPDs should be required for all residential SUE sites – including Bank Lane (Kirkby), Edenhurst Avenue (Huyton) and Carr Lane (Prescott) to ensure consistency).
- No compelling evidence that there will be any adverse impact on the two main Principal Regeneration Areas (PRA) through the immediate release of the SUE sites.

2.2 Question 2.2

The approach to SUE's now advocated by the Council does adequately address the availability of a 5 year housing land supply providing the adoption of the Core Strategy and approval of relevant SPD's is not unduly delayed. We welcome the fact the Council has begun preparation of the master planning exercise for Land South of Whiston (SUE2c) which will inform the SPD.

2.3 Question 2.3

Response – no comment.

2.4 Question 2.4

We are broadly satisfied with the proposed criteria to be applied to new policy SUE2. However, to be properly justified and effective it should be improved by:

- Reinforcing the need for development to be viable and deliverable by reflecting paragraph 173 of the NPPF which states: "...sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viable is threatened". This will help to ensure that sites come forward quickly and are developed to a high quality.
- Requiring all residential (or residential mixed use) SUE sites to only come forward in accordance with an approved SPD. This will ensure consistency in the quality of new housing across the borough.
- Specifically referring to the need for close consultation and collaboration with landowners/developers in preparing SPD's for each site. This will ensure development is viable and deliverable and comes forward quickly.
- Wording of #3 (Site Specific Requirements) is too mandatory. A master plan and SPD should only 'guide' development. The current wording is too inflexible. We recommend an alternative wording is discussed and agreed at the Hearing.

2.5 Question 2.5

As above, we have no objection to the preparation of master plans and SPDs to 'guide' development at the SUE sites but they should not be overly prescriptive. Policy SUE2 needs to reflect this.

2.6 Question 2.6

Response – no comment.

2.7 Question 2.7

Response – no comment.

2.8 Question 2.8

The approach to the development of Land South of Whiston for housing is appropriate for the same reasons set out in our evidence to the Hearing in November 2013 and amplified during the Hearing in relation to housing need (both open market and affordable), economic need, sustainability, and Green Belt objectives.

2.9 Question 2.9

Response – no comment.

2.10 Question 2.10

Response – no comment.

2.11 Question 2.11

The main implication is that overall housing land supply is likely to be boosted because development within the PRAs will become more viable and deliverable. This also reinforces the complementary role of the SUE sites, subject to their own viability.

2.12 Question 2.12

Response – no comment.

2.13 Question 2.13

Response – no comment.

2.14 Question 2.14

Response – no comment.

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