



Your Ref: MR/1202

Our Ref:

15th May 2015

Paul Morris
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Knowsley Local Plan Core Strategy Examination
Municipal Buildings
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Dear Mr Morris

RECONVENED EXAMINATION HEARINGS – WRITTEN STATEMENT

This Hearing Statement has been submitted on behalf of Mrs A Percival in respect of the additional Matters raised by the Inspector for discussion at the Hearings scheduled for 2nd and 3rd June 2015. These representations principally relate to the land 'South of Whiston' where Mrs Percival has a landed interest in the form of Halsnead Park. Furthermore, these representations should be read in conjunction with those previously submitted at earlier stages.

What are the implications of the new household projections for the KLPCS, particularly in relation to the objectively assessed need for housing?

It is considered that there are no implications associated with the new household projections for the KLPCS. As detailed in Table 2 and Figure 4 of AD60, household projections for Knowsley are shown to be comparable to those in the previous 2011-based interim projections. As detailed within the PPG, these household projections represent the starting point in the assessment of objectively assessed housing need (OAN) and may require adjustment to reflect relevant demographic factors not captured in past trends.

As with the 2011-based interim projections, the 2012-based projections demonstrate a decline in population growth. Whilst there is set to be positive natural growth over the Plan period (2011-2028), this is being significantly countered by net out-migration; with the District's working age population (16-64) being most adversely impacted.

However, the Government's projections are trend-based and consequently have been significantly influenced by the past under-delivery of housing in the District. This applies equally to both the 2011-based interim household projections and the 2012-based household projections which do not therefore provide a reasonable basis on which to plan for future housing growth.

The key determining factor is the level of population growth required to provide for sustainable economic growth in accordance with paragraph 2a-18 of the PPG. To stabilise the projected decline in population in Knowsley, in particular the working age population, an increase in dwellings per annum on-top of the

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household projections is required. This is confirmed in paragraph 3.4.2 of the Council's Matter 3a Statement which demonstrates a range of scenarios based on evidence of potential future job distribution. This shows the potential for between 44-266 jobs to be created per annum with the provision of between 466 and 575 dwellings per annum – similar to those detailed within the KLPCS.

Whilst such requirements should always be treated as a minimum requirement in line with the ethos of the NPPF to boost significantly the supply of housing, it is clear that there are no implications associated with the new 2012-based household projects for the KLPCS and that the housing requirement for the District needs upward adjustment from the CLG projections to reflect the loss in working age population.

Are there other changes in the evidence base which materially affect the assessments of housing need and supply?

It is understood that there have been no changes to the Council's evidence base which materially affect the assessments of housing need and supply. However, we reserve the right to review and comments on any representations from the Council or other interested parties as and when this information is brought to the Inspector's attention.

What are the implications (if any) of the Ministerial Statements and PPG revisions for the KLPCS, particularly in relation to:

(a) development in the Green Belt

The Government's October 2014 Ministerial Announcement does not represent a change in policy regarding the Green Belt. National Green Belt Policy is enshrined within the NPPF which came into force in March 2012. This has not been altered in any way by any Ministerial Statement. Rather, the Ministerial Announcement simply reiterates the importance of protecting Green Belt land. The PPG also provides further guidance on interpreting the NPPF, and requires local planning authorities to, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Whilst such policies do include those relating to land designated as Green Belt, the PPG also reiterates that Green Belt boundaries can be altered in exceptional circumstances, through the preparation or review of the Local Plan. This remains the case in Knowsley and indeed in many other local authorities trying to ensure that objectively assessed needs are being met. It is also important to note that the SUE's were required to ensure that the Council could demonstrate a continuous five-year supply of deliverable housing land. This is a key requirement of the NPPF.

(b) other matters

The other matters are detailed development management matters and can be properly considered during the preparation of an appropriate planning application.

Having regard to the above matters, are the proposed SUEs at the following locations justified and consistent with national policy?

(a) South of Whiston

We note that the 'soundness' of the SUE at South of Whiston has already been subject to assessment during the previous Examination sessions. It is the position of Mrs Percival that there are no new matters arising from the above discussions that materially change the justification for the SUE or its consistency with national policy. Firstly, the SUE are still required to ensure that the Council can demonstrate a five-year supply of deliverable housing land as per paragraph 47 of the NPPF. In this regard, they are justified. Secondly, there has been no material change in household growth between the 2011-based interim projections and the latest 2012-based projections. It remains critical that the Council plan for higher levels

of household growth that the Government's trend-based projections to ensure sustainable economic growth and to plan positively. Thirdly, there has been no change in national Green Belt policy since the NPPF which confirms that boundaries can be altered by an LPA in exceptional circumstances through the preparation of a new local plan - as is the case in Knowsley.

I trust that the above information will be taken into account during the final preparations of the KLPCS.

A handwritten signature in black ink, appearing to read 'Matthew', with a long horizontal flourish underneath.

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