



**Knowsley Local Plan: Core Strategy Examination  
(Reconvened Examination Hearings 2-4 June 2015)**

## **Written Statement Relating to Matter 4**

Representor I.D. 73

In respect of  
**Land off Fox's Bank Lane, Whiston**

May 2015

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# 1 Introduction

## 1.1 Purpose

This Written Statement has been prepared by Frost Planning Ltd in connection with the Examination of the Knowsley Local Plan Core Strategy ('KLPCS') and the 'Reconvened Examination Hearings' which are due to take place on 2 - 4 June 2015.

This Written Statement principally addresses the Inspector's Matter 4 (New Matters Arising Since July 2014 Hearings) and the specific questions (4.1 – 4.4 inclusive) raised in the Inspector's Agenda.

Frost Planning previously made written representations to the 'Proposed Submission' stage of the KLPCS in 2012 and attended the original hearing examination in 2014. We note from the Inspector's Note (EX39) and the Guidance Note (EX04) that there is no need to repeat arguments previously made as the Inspector will give full weight to written representations made at the Proposed Submission stage and during the initial hearing examination. Therefore, this statement purely addresses the new matters and specific questions set out in the Inspector's Agenda. However, we reserve the right to respond verbally to any additional new matters, questions or evidence raised at the forthcoming hearings.

## 1.2 References

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

## **2 Matter 2 - Legal Compliance and Procedural Matters**

### **2.1 Question 2.1**

**Is the Knowsley Local Plan: Core Strategy (KLPCS) in general accordance with the Statement of Community Involvement? Has the KLPCS emerged from an open and transparent process that demonstrates how and why the preferred strategy was selected, in consultation with the public and other stakeholders?**

Frost Planning has no comments to make regarding Matter 2 (Legal Compliance and Procedural Matters) raised by the Inspector other than to note that EX37 (Council Note on Consultation Processes, January 2015) provides a clear account of the community consultation which has been undertaken by the Council at all previous stages of the KLPCS. It demonstrates that they have met and exceeded the statutory requirements.

## 3 Matter 4 – Response to Consultation on Main Modifications

### 3.1 Question 4.1

Having regard to emerging matters including revisions to PPG relating to Green Belt protection, new household projections, evidence of increased densities on certain housing sites, and so on, and in light of recent substantial public opposition, is the proposal to safeguard land at Knowsley Village for housing development beyond the Plan period necessary and does it satisfy the exceptional circumstances test of national policy?

No Comment.

### 3.2 Question 4.2

Given the representation submitted by Lord Derby, does the proposal to safeguard land at Knowsley Village for longer term housing development have the full support of the land owner? Is all the land likely to be available for development beyond the Plan period?

No Comment.

### 3.3 Question 4.3

Having regard to emerging matters including revisions to PPG relating to Green Belt protection, new household projections, evidence of increased densities on certain housing sites, and so on, and in light of further public opposition, are the proposed SUEs at the following locations justified and consistent with national policy?

#### a) South of Whiston

For the reasons made clear at the previous hearings in 2014 and set out in our response to Matter 3 to the forthcoming hearings, Frost Planning does not consider the revisions to the PPG relating to Green Belt, new household projections, increased densities, or any other material considerations, override the strong justification for the release of land 'South of Whiston' for residential development. The release of the land from the Green Belt remains consistent with national policy in the national Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) given the overriding housing, social and economic necessity – i.e. *exceptional circumstances*.

#### b) South of M62 (employment location)

No comment.

#### c) East of Halewood

No comment.

#### d) Knowsley Lane, Huyton

No comment.

**e) Edenhurst Avenue, Huyton**

No comment.

**f) A58 Prescot**

No comment.

**g) Carr Lane, Prescot**

No comment.

**3.4 Question 4.4**

**Are further adjustments to the wording of the following policies necessary?**

**a) SUE 2**

Frost Planning considers the wording of Policy SUE2 (Main Modifications) to be generally acceptable. It provides a suitable policy framework for bringing forward the SUE in a timely, coherent and comprehensive manner.

I would however agree with other parties regarding the terminology used in relation to part 4 of the policy. The current wording may be construed as placing the SPD on a par with the development plan. This would be legally incorrect. To avoid this, Frost Planning considers that the policy should simply require the master plan to accord with Policy SUE2 and have regard to the SPD.

**b) SUE 2a-2c**

We welcome the wording provided by the KLPCS (Main Modifications).

Our client intends to work closely with the Council, other landowners and the local community to ensure that any future outline planning application is in accordance with Policy SUE2c and has proper regard to the emerging Supplementary Planning Document (SPD) for the site.

**c) CS 11**

No comment.

**d) CS 20**

No comment.

**e) CS 22**

No comment.

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