



Nathaniel Lichfield
& Partners
Planning. Design. Economics.

**Knowsley Local Plan Core Strategy
Examination**

Statement in Respect of Matter 4

Sustainable Urban Extensions &
Wording of Main Modifications

Bellway Homes Ltd (North West Division)
8 May 2015

41497/02/SPM

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Appendix 1 Proposed Modifications – Consultation Representations Form

1.0 Introduction

- 1.1 Nathaniel Lichfield & Partners [NLP] are instructed by Bellway Homes Ltd (North West Division) [Bellway Homes] to submit a statement in respect of the Knowsley Local Plan Core Strategy Examination Matter 4: Response on Main Modifications. These representations are made in respect of land at East Halewood.
- 1.2 NLP have previously acted on the East Halewood site on behalf of the owners of the site, Taylor Wimpey UK Limited and Redrow Homes Limited [ID1104]. We have previously submitted detailed representations to the Knowsley Local Plan: Core Strategy [KLPCS]. We also participated in the original Examination in Public and submitted statements to:
- Matter 2: Spatial Development Strategy and Principles
 - Matter 3: Housing Provision
 - Matter 5: Green Belt
- 1.3 Additional representations were submitted to the reconvened hearings which took place in July 2014 [reference 104] on behalf of the landowners. These were prepared by Cass Associates and addressed the undersupply of housing land, Green Belt and the five year housing land supply.
- 1.4 The following representation supplement those previously made and should be made along those, but address specific questions raised by the Inspector for the reconvened hearing,

Sustainable Urban Extension (SUEs)

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?

(c) East of Halewood

- 2.1 Bellway Homes support the representations made previously by Taylor Wimpey and Redrow Homes in respect of the allocation of the East Halewood site for development. It is not considered that the revisions listed above have any significant bearing on the allocation of Green Belt sites. The allocation of East Halewood remains fully justified and consistent with national policy.
- 2.2 As set out fully in the response to Questions 3.1 (Matter 3) a figure of housing figure of 450 dpa represents the absolute minimum that should be taken forward in the Local Plan. The Council's own evidence also shows that there is not sufficient land in the urban area and outwith the Green Belt to meet the dwelling requirement for the plan period identified in the emerging KLPCS. As a result, there is a clear need for the release of Green Belt land to meet this requirement. The land is required now and East Halewood should be allocated for residential development.
- 2.3 Bellway Homes concur with the Council that East Halewood no longer fulfil the purposes of including land within the Green Belt. The Knowsley and Sefton Green Belt Study concludes that land East of Halewood (north) has capacity to deliver 236 dwellings [KGBS 19] and land East of Halewood (south) has capacity to deliver 888 dwellings [KGBS 20]. No emerging matters have changed the position of the East Halewood site in this respect.
- 2.4 Master planning work has been undertaken on the site which confirms that the land is capable of accommodating in the region of 1,200 – 1,300 dwellings as well as meeting open space requirements, amenity and providing a strong long term defensible boundary to Halewood. The release of the site will help deliver a comprehensively planned urban extension to this part of Halewood and it will maximise the amount of development that can be delivered on the site as identified by the Council.
- 2.5 The allocation of the site is justified and deliverable, and there are no constraints which would prevent its development for residential use. The site has been selected on the basis of robust evidence on all environmental and other impacts. This evidence is set out in Matter 5 (Green Belt) and the Development Statement (prepared by Taylor Wimpey and Redrow) that forms

part of the Council's evidence base for the Local Plan. I will not repeat those matters here.

2.6

However, in summary, the site:

- Will meet an identified need for housing land within the Borough;
- Is the most sustainable Green Belt site on the edge of Halewood;
- Is not subject to any highways constraints that would prevent its development. Robust assessment work has been undertaken which confirms that the delivery of 1,200 – 1,300 dwellings would be acceptable in the context of the Framework [§32];
- Would not be contrary to the purposes of including land in the Green Belt and there are exceptional circumstances to justify its release;
- Would involve the use of high quality agricultural land. However, the need to deliver housing in more sustainable locations outweighs the need to retain the site for agricultural land purposes;
- Is not subject to any landscape constraints which would prevent its development; and,
- Is not subject to any ecological constraints which would prevent its development.

2.7

The allocation of the East Halewood Site is justified and deliverable. There are no flooding, drainage, traffic, , agricultural, or ecological constraints that would prevent its development. This is a fact support by the council and the Inspector in the previous findings (interim) on this site. There have been no material change in circumstances that would impact on the allocation of this site and that should alter the Inspectors Interim findings. The site should be released from the Green Belt and allocated for development now.

3.0

Wording of Main Modifications

Question 4.4

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

(b) SUE 2a-2c

3.1

Bellway Homes have previously submitted representations (14-11-14) on the wording of Policy SUE2 and SUE2a-c in the response to the Proposed Modifications. These representations remain relevant to question 4.4 and to avoid repetition have been appended to this statement (Appendix 1).

3.2

We support the view expressed in those representations and suggest minor changes are made in the wording of that policy in accordance with that letter.

Appendix 1 Proposed Modifications – Consultation Representations Form

Knowsley Local Plan: Core Strategy

Proposed Modifications - Consultation

Representations Form



RETURNING THIS FORM

Please return form to be received by Knowsley Council by **12 noon on Friday 14 November 2014. Forms received after this time can not be accepted.**

- By email: LocalPlan@knowsley.gov.uk
- By Post: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool, L36 9YU (postage required)

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

PLEASE CONSULT THE GUIDANCE NOTES AT THE END OF THIS FORM AND COMPLETE ALL QUESTIONS

PART A – PERSONAL DETAILS

	Personal Details*	Agents Details*
Title	Ms	
Name	Jane Aspinall	
Job Title (if appropriate)	Planning Manager	
Organisation (if appropriate)	Bellway Homes Ltd (North West Division)	
Postal Address	2 Alderman Road Liverpool	
Postcode	L24 9LR	
Telephone Number	0151 486 2900	
Email Address	Jane.Aspinall@bellway.co.uk	
Preferred Method of Contact	email	

**if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*

PLEASE NOTE: Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However

in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Jane Aspinall – Bellway Homes Ltd (North West Division)

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M001 etc.

Policy Ref

Paragraph Ref

1.3 etc.

2. Do you consider that the proposed modification is...? (please tick relevant box)

Yes

No

a) Legally Compliant? (see guidance note 2.2)

b) Sound? (see guidance note 2.3)

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

Proposed Modifications M001, M020, M022 and M024 are supported in providing clarification on the role of the Sustainable Urban Extensions, including the site East of Halewood.

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting or seeking a change to one of the modifications to the Core Strategy** **and there is a further public hearing as part of the Examination**, would you wish to participate in any such hearing? (please tick relevant box)

a) No, I do not want to participate at any further public hearing

b) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature

Date

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Jane Aspinall – Bellway Homes Ltd (North West Division)

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M042

Policy Ref

CS1

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|-------------------------------------|--------------------------|
| c) Legally Compliant? (see guidance note 2.2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Sound? (see guidance note 2.3) | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

We support the identification and allocation of the Sustainable Urban Extensions in Policy CS1 including the last East of Halewood which is required to meet identified needs for housing.

Continue on a separate sheet if necessary...

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination**, would you wish to participate in any such hearing? (please tick relevant box)

c) No, I do not want to participate at any further public hearing

d) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature

Date

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Jane Aspinall – Bellway Homes Ltd (North West Division)

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M055

Policy Ref

CS3

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|--------------------------|
| e) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox"/> |
| f) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

We support the identification and allocation of the Sustainable Urban Extensions in Policy CS3 including the last East of Halewood which is required to meet identified needs for housing.

For the reasons we state in our response to Policy CS5 we do not consider that there is a requirement for Criterion 4 within the body of the policy and that this should be moved to the supporting text. There is therefore no need to cross reference Policy CS5 within the text of Policy CS3.

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination**, would you wish to participate in any such hearing? (please tick relevant box)

e) No, I do not want to participate at any further public hearing

f) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature

Date

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Jane Aspinall – Bellway Homes Ltd (North West Division)

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M078

Policy Ref

CS5

Paragraph Ref

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|--------------------------|
| g) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox"/> |
| h) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

This modification seeks to insert wording which is not in itself a “policy” and provides information. This text should be included in the supporting justification and is not necessary within the body of the policy.

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination**, would you wish to participate in any such hearing? (please tick relevant box)

g) No, I do not want to participate at any further public hearing

h) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature

Date

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Jane Aspinall – Bellway Homes Ltd (North West Division)

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M133 etc.

Policy Ref

Paragraph Ref

6.5 etc

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|--------------------------|
| i) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox"/> |
| j) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

We support the provision of clarification that the area priorities will apply to the Sustainable Urban Extensions in M133 and M166. However, as Policy CS5 is effectively a relatively standard Green Belt policy it is unclear why the reference to this policy is retained as the review is no longer (due to modifications to that policy) “in accordance” is incorrect and the policy does not now on its own seek to meet development needs (it is a policy of constraint).

We support the modification of the Halewood Map (6.4) as proposed by M167.

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting or seeking a change to one of the modifications to the Core Strategy** **and there is a further public hearing as part of the Examination**, would you wish to participate in any such hearing? (please tick relevant box)

i) No, I do not want to participate at any further public hearing

j) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.

Signature

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PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Jane Aspinall – Bellway Homes Ltd (North West Division)

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M168 etc

Policy Ref

Paragraph Ref

N/A

2. Do you consider that the proposed modification is...? (please tick relevant box)

- | | Yes | No |
|---|--------------------------|--------------------------|
| k) Legally Compliant? (see guidance note 2.2) | <input type="checkbox"/> | <input type="checkbox"/> |
| l) Sound? (see guidance note 2.3) | <input type="checkbox"/> | <input type="checkbox"/> |

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

We support the amendments that are proposed through M168 which proposes the inclusion of an additional chapter to address the proposed Sustainable Urban Extensions.

We support the proposed wording of Policy SUE1 and the recognition that these sites are meeting needs during the current plan period and beyond and the implementation of the associated changes to the Green belt boundaries. We specifically support the inclusion of the East of Halewood site (criterion 1(g)) for a residential led development. Criterion 4 should be amended as it refers to “guidance” in policies SUE2 and SUE2a to 2c but this is policy and not guidance. Criterion 5 may not be necessary as by reference to the Policies Map and Policy CS5 it is apparent that this is a matter of fact rather than policy.

In terms of Policy SUE2, whilst we support the Policy in principle, the degree to which it adds value rather than simply repeats other policies is however unclear. It is apparent in terms of the detailed criteria that:

- 1(a) repeats Policy SD1
- 1(b) requires a comprehensive approach but this could be included within SUE1 and repeats Policy CS27
- 1(c) repeats Policy CS19
- 1(d) repeats Policy CS2

Continue on a separate sheet if necessary...

4. If you are objecting to the modification please set out how you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

- 1(e) repeats Policy SUE1
- 1(f) repeats Policy CS8 and CS21
- 1(g) repeats Policy CS7
- 1(h) repeats Policy CS20
- 1(i) repeats Policy CS24
- 2) makes reference to “indicative considerations” which are not in themselves policy and therefore this could be in the supporting text.
- 3) simply confirms the council will prepare SPD for certain sites which again is not in itself a policy and just is a statement of intent.
- 4) provides more detail on 1(b) as outlined above but this could be reasonably incorporated within Policy SUE1.

On this basis it is considered that a large part of this policy could be omitted or included within the supporting text, and that those parts which cannot, can be readily and more appropriately incorporated within Policy SUE1.

Policy SUE2b applies specifically to the land East of Halewood and is broadly supported, subject to the comments on SUE2 and associated references, and the matters below. It is known that part of the site is constrained by flooding but the degree to which this impacts upon the capacity of the site is not precisely known. It is considered that the site could readily accommodate 1200 to 1300 dwellings and that evidence has previously been submitted to the Inspector (see the Development Statement for this site (Examination Document RH26a).

Continued...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination, would you wish to participate in any such hearing? (please tick relevant box)

k) No, I do not want to participate at any further public hearing

l) Yes, I wish to participate at any further public hearing

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It is therefore considered that the yield from this site should be identified to be **at least** 1200 dwellings rather than “approximately 1100 dwellings”. There is no evidence that indicates that this higher requirement cannot be achieved and indeed past masterplanning work has indicated that even taking into account the open space and flood mitigation requirements, a significantly higher yield can be achieved.

In addition to the proposed residential development it is considered that other uses may be appropriate on the southern portion of the site between Higher Road and the railway line to the south. The policy should be amended to make provision for the fact that some non-residential uses may be appropriate on the site. This would allow the SPD to provide guidance on what these may be and the circumstances in which they may be acceptable.

PART B – YOUR REPRESENTATIONS

(Please use duplicates of Part B if your comments relate to more than one modification)

Name and/or Organisation

Jane Aspinall – Bellway Homes Ltd (North West Division)

1. To which proposed modification to the Core Strategy does this representation relate?

Modification Ref

M179 etc.

Policy Ref

CS17

Paragraph Ref

7.23

2. Do you consider that the proposed modification is...? (please tick relevant box)

	Yes	No
m) Legally Compliant? (see guidance note 2.2)	<input type="checkbox"/>	<input type="checkbox"/>
n) Sound? (see guidance note 2.3)	<input type="checkbox"/>	<input type="checkbox"/>

3. If you wish to object, please state here why in your view the proposed modification is not legally compliant or sound (referring to the Government's legal and soundness requirements – see notes 2.2 and 2.3). If you wish to support the modification, please use this box to set out your comments.

We support the deletion of the requirement to achieve the Code for Sustainable Homes, BREEAM and decentralised renewable and low carbon energy systems (see also M183, M208, M209, M210, M212, M215, and M217) and the removal of the requirement to achieve Building for Life and Lifetime Homes. We do not consider that those requirements could be justified and could adversely affect the deliverability and viability of new development.

4. If you are **objecting** to the modification please set out **how** you consider it should be changed to make it legally compliant or sound (see guidance notes 2.2 and 2.3). Please put forward any suggested revised wording to policy or text.

Continue on a separate sheet if necessary...

PLEASE NOTE - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and your suggested change.

5. If you are **objecting or seeking a change to one of the modifications to the Core Strategy and there is a further public hearing as part of the Examination**, would you wish to participate in any such hearing? (please tick relevant box)

m) No, I do not want to participate at any further public hearing

n) Yes, I wish to participate at any further public hearing

PLEASE NOTE - if you would like to appear at any further public hearings, this confirmation will be used to programme any hearings. The Inspector will determine whether there is a need for any further hearings as part of his examination of the Core Strategy.















Signature

Date



Nathaniel Lichfield
& Partners
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