

KNOWSLEY LOCAL PLAN: RE-CONVENED EXAMINATION HEARINGS – JUNE 2015

WRITTEN STATEMENT ON BEHALF OF UNITED UTILITIES

REPRESENTOR NO.: 106/127

This brief statement is in response to some of the matters raised in Examination Document EX39 (Purpose and Scope of Further Hearings). In the context of EX39 the particular interest of United Utilities is in the specific allocation at Carr Lane, Prescott as a Sustainable Urban Extension (SUE).

This statement will address:

- Justification for the allocation of land at Carr Lane, Prescott as a Sustainable Urban Extension (SUE).
 - Ministerial announcements and revisions to Planning Practice Guidance as far as these relate to the Green Belt.
 - New household projections.
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1 Justification for the allocation of land at Carr Lane, Prescott as a Sustainable Urban Extension (SUE)

There is no need at this stage to either repeat the arguments or reproduce the evidence that supports the allocation of land at Carr Lane for housing. It is pertinent, however, to summarise aspects of the two sets of Interim Findings issued by the Inspector.

Interim Findings January 2014

- (a) The minimum net target of 8,100 dwellings over the Plan period (an average of 450 per annum) is sound.
- (b) There is currently a shortfall in the five year supply of deliverable sites for housing when allowance is made for backlog.
- (c) The identified supply is equivalent to about 4.3 years of housing.
- (d) Sites in the Green Belt need to be brought forward earlier than anticipated in the Submission Core Strategy if the Local Plan is to be found sound.
- (e) **The identification of reserve locations for release of land from the Green Belt is sound.**
- (f) The primary use of land at Carr Lane should be solely housing.
- (g) To meet immediate housing land supply problems it appears that at least some reserve locations will have to be redefined as specific site allocations in advance of the preparation of the Site Allocations Development Plan.

We maintain that there is no justification or evidence that requires these Interim Conclusions to be revisited. The principle that Green Belt land needs to be brought forward to meet housing need is sound. The way in which the Council has approached the identification of land to be released from the Green Belt for housing is sound.

Interim Findings August 2014

- (a) The identification of Sustainable Urban Extensions (SUEs) and the removal of the phasing mechanism for the release of those sites for development is sound.
- (b) The revision to the calculation of a five year housing land supply is sound.

These findings reinforce support for the identification, allocation and release of SUEs as proposed in the modified Local Plan.

Concerns have been raised by objectors in relation to the allocation of land at Carr Lane for housing (in response to the consultation on the proposed Main Modifications to the Knowsley Local Plan Core Strategy). There is no imperative to provide a detailed rebuttal at this stage but, for reference purposes, a summary is useful.

Objection or Comment	Rebuttal or Comment
1 No justification for the release of land from the Green Belt.	The Green Belt Study and Green Belt Technical Report provide the evidence to justify the release of land from the Green Belt. The approach was found to be sound in the Inspector's first set of Interim Findings. The release of land from the Green Belt to meet housing needs has also been found sound.
2 The existing use of the land should be maintained.	Evidence previously submitted by United Utilities shows the degree to which the former use as a waste water treatment works has impacted on the land quality. Remediation is needed. There is no public access. The land is degraded. It serves no beneficial purpose for recreation or as greenspace. There are no nature conservation impediments. Ecology survey evidence submitted by United Utilities at previous stages of plan preparation shows no nature conservation impediments to development.
3 Type of new development	The first set of Interim Findings issued by the Inspector identified that the original proposed land uses at Carr Lane (employment and/or housing) were not sound because the adjacent land is likely to be developed for housing. It is concluded that 'the primary use of this location should be solely housing' (Paragraph 11).
4 Impact of traffic	A preliminary access study commissioned by United Utilities was submitted at earlier stages of preparation of the Local Plan. It concludes that the land can be adequately accessed, it is in a sustainable location and the traffic arising from housing development will have no material impact on highway operation. This site specific evidence has been subsequently substantiated by the Council through strategic studies and consultation with the Highways Agency.
5 Nature conservation	Refer to site specific ecology study mentioned above. This and the appropriate assessments undertaken by the Council do not show that nature conservation interests in any way outweigh the need for housing development at this location.

6 Air quality	There are no Air Quality Management Areas in Knowsley. There is no evidence to suggest that existing or future air quality conditions are an impediment to development.
7 Flood Risk	Evidence has been submitted at earlier stages of Local Plan preparation to address the potential for flood risk. The land at Carr Lane is in Flood Zone One (low risk) and the Environment Agency has no record of flooding on the site. The land is not at risk of flooding from main rivers or local watercourses.
8 Infrastructure	The process of identifying SUEs has involved liaison with infrastructure providers, including schools and medical service providers. No capacity issues have been identified.
9 Adjacent areas	Development of the land at Carr Lane will have a positive impact on the South Prescott Action Area. It can be well integrated with the approved mixed use scheme on the neighbouring site. The regeneration benefits will be considerable and tangible.

Overall, the objections and concerns that have been raised do not outweigh the considerable benefits to be derived from the recycling of this previously-developed land for housing that is needed in the Plan period.

2 Ministerial Announcements and revisions to Planning Practice Guidance (PPG) as far as these relate to the Green Belt

The examination of the evidence that underpins the preparation of the Local Plan has led the Inspector to conclude that the objective assessment of housing need has been carried out on a sound basis. Moreover, it has been identified that this need in Knowsley should be met in full. There is nothing in the particular character or circumstances in the Borough of Knowsley (including the ability of neighbouring authorities to absorb development needs arising in Knowsley) that indicates that development (ie. meeting objectively assessed needs) should be restricted in any way.

It has also been found that, as a consequence of limited and restricted opportunities for housing in Knowsley, there is sound justification for the principle of the release of land from the Green Belt to meet objectively assessed needs. This represents exceptional circumstances.

The PPG (housing and economic land availability assessment – stage 5 – final evidence base) requires Local Plans to show how objectively assessed needs are met in full ‘unless adverse impacts of doing so would significantly and demonstrably outweigh the benefits’. This needs to be viewed in the context of the National Planning Policy Framework (NPPF) as a whole. The PPG highlights that development should only be restricted when the benefits of meeting development needs in full are outweighed by adverse impacts on, for instance, sites protected under the Birds and Habitats Directives, land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park or the Broads, designated heritage assets and locations at risk of flooding or coastal erosion.

In Knowsley, a robust range of options for meeting objectively assessed housing needs has been considered. These have been weighed against many factors, including those highlighted in the PPG. It has been found that release of land from the Green Belt is the most sustainable and realistic way of meeting housing needs. The approach to identifying appropriate sites in the Green Belt has been systematic and rational. A key consideration has been to observe the purposes and objectives for including land in the Green Belt. In this way any adverse impacts on the Green Belt have been minimised.

It has been shown that the release of land from the Green Belt in Knowsley is justified. There are exceptional circumstances. There is no conflict with ministerial announcements or the revised PPG.

3 New household projections

The PPG suggests that the household projections published by the Department for Communities and Local Government (DCLG) should be used as a starting point for the estimate of overall housing need but that the weight given to these should take account of the fact that they have not been tested (which could evidence a different housing requirement to the projections, for example because of past events that affect the projections are unlikely to occur again or because of market signals) or moderated against relevant constraints.

The Sub National Household Projections published by DCLG in February 2015 provide an updated base for the assessment of housing need in Knowsley. However, as pointed out in the PPG, these projections are only the starting point. Key drivers for new housing need to be factored in such as past events (recessionary) that have influenced the household growth trends, household structure and economic factors. The modelling to arrive at objectively assessed housing need is, as a consequence, complex.

If the strategic objectives of the Local Plan are to be met then the housing needs set out in the Submission Local Plan need to be seen as a minimum. There is no need at this stage to re-model the assessment of housing need in the light of the 2015 Sub National Household Projections.