

In response to your email last month I do not think I will be able to attend due to work a commitment, however other than the previously raised comments, things have moved on a bit in recent months with the election results and the subsequent party pledges made, as such I need the following matters to be included/added to the Hearing process as these matters have not previously been raised in relation to the release of greenbelt land in particular to the Land at Edenhurst Avenue.

The Conservatives' election manifesto, proposed the creation of a £1 billion brownfield fund to unlock homes on previously developed land and says a Tory government would require councils to ensure that 90 per cent of brownfield sites have planning permission by 2020. Based on this the council must revisit their proposals for this situation as the council have previously been very silent on the development of brownfield sites, which was highlighted in the in the attached correspondence. I also need the attached correspondence to be represented in relation to this matter as it very clearly identifies matters which have previously not been raised.

As a result of the election the council must take on board the political parties' emphasis as set out in the Conservative manifesto (as well as within the other party's manifestos) the obvious shift in emphasis from Greenfield to brownfield development. The Conservative party have given priority to promoting brownfield development as did the Labour party leader, at the time, Ed Miliband who promised to "restore the brownfield-first principle".

There is clear indication that the councils directive is to safeguarded Green Belt protection and increased protection of the green spaces.

It is a requirement of the council to foresee the potential impact and problems any release of greenbelt will create, particularly in relation to any release of Land at Edenhurst Avenue. The council need to make sure local communities know up-front that necessary infrastructure such as schools and roads that will be provided, the council have not done this and cannot confirm how they will protect the Land at Edenhurst Avenue from any potential through road from Liverpool. The local school to Edenhurst is within Liverpool Council control and this school is already oversubscribed as are the other schools in the area. They are currently going through a process of increasing its intake to accommodate additional pupils following the recent developments in the Liverpool area and this will not take into account further development of land adjacent to Hartsbourne Avenue/Napps Way which will again put greater strain on local facilities. The development of Edenhurst would put this school and the other surrounding schools beyond their tipping point.

The council are required to have a register of available brownfield sites, if one is available I have not been able to locate it, even following requests. If one is available, is it current and upto date, if not the council have not considered all possible avenues to develop these brownfield sites. This also has added importance with the introduction of the Brownfield Fund. Have the council made suitable provision to explore the funding available, the council have a duty to explore this funding stream before they make such a huge decision for any Greenbelt release.

At the time of the consultation in Oct/Nov and the councils sudden shift in viewpoint, without reason or justification, to substantially bring forward the original timeline for the review of the Greenbelt Land at Edenhurst, they did not suitably make the residents that would be affected by this, aware of their proposals, if it had done the majority of resident within Bowring Park estate would appose this. This is highlight by the increase in the volume of responses made to the council through the residents word of mouth. If this proposal had been appropriately highlighted during the consultation then the number of responses would have been even greater. This is of greater importance now with the government and Labour parties shift in emphasis to develop Brownfield sites.

Ultimately I cannot see how the council can justify the removal of the Greenbelt designation currently held at Land at Edenhurst Avenue. The small gain that would be achieved in residential properties, 84, cannot outweigh the impact this development could have on the residents of this area in Knowsley.

Many thanks for your time.
Kind regards,
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14 November 2014

Dear Local Plan Team

CPRE Lancashire comments on Knowsley Local Plan: Core Strategy Schedule of Proposed Modifications to the Submission Document September 2014 - Consultation Version

Introduction

1. The Lancashire Branch of the Campaign to Protect England, which includes Greater Manchester and Merseyside, is delighted to respond to the above-mentioned consultation. Knowsley has some lovely rural places, and our charity seeks continued protection and enhancement of for the benefit of for future generations.
2. We recognise the critical role that the Local Plan and the continued use of Green Belt designation in delivering our aim of a beautiful and living countryside in the future. We read the documents and provide our detailed comments in Appendix A. CPRE promotes Smart Growth and we provide further details on how to achieve this in Appendix B.

Downgraded Population Growth

3. In our previous submission to the Council on 12 December 2012 we highlighted our positive support for much of the document, particularly the vision to provide 'attractive, sustainable neighbourhoods' and to adopt a 'plan, manage and monitor approach to housing delivery. However, we did highlight our concern that the scale of housing development set out in Policy CS3 was too large, and unjustified given the trend of population decline.
4. To add weight to this argument, in June 2014 the announcement on the downgraded population growth estimates by the Office of National Statistics, means Knowsley now requires a reduction in predicted housing numbers for its local plan making purposes. The full datasets can be found at <http://www.ons.gov.uk/ons/rel/snpp/sub-national-population-projections/2012-based-projections/index.html> We believe this recent reduction in forecast population and associated household formation therefore means less housing should be

planned for in Knowsley and query what has Knowsley Council done about getting revised household projections?

National Planning Policy Framework - Absence of a Local Plan and/or Five Year Housing Land Supply

5. The National Planning Policy Framework (NPPF) is clear that where the local plan is absent or a five-year housing land supply cannot be demonstrated there is a presumption in favour of sustainable development. In July we evidenced the powerful threat to countryside posed by the operation of the five-year housing land supply (as defined by Paragraph 47 and qualified by Note 11). We show the loss of greenfield land at appeal, including Green Belt, for housing development at an alarming rate, frequently against local wishes. We understand the potential for ‘land-banking’ of sites (especially brownfield) to promote the release of most profitable greenfield and this is something our charity is calling on Government to tackle. Our report can be viewed here: <http://www.cprelancashire.org.uk/campaigns/housing-and-planning/housing/the-issues/item/2144-five-year-housing-land-supply>.
6. CPRE Lancashire therefore recognises that Knowsley needs a Local Plan based on sound strategic planning and sustainable development principles, as soon as possible as without planning policy protection speculative developers can continue with ‘unstrategic’ and sporadic development which seriously degrades the quality of rural places.

Revised Planning Practice Guidance (PG)

7. In October 2014 the Government revised Planning Practice Guidance (PG) to try and make the operation of the NPPF more balanced with regards to environmental protections. There is no doubt as to the government’s motivation in making the revision; in the words of the Secretary of State for the DCLG “protecting our precious Green Belt must be paramount”.
8. Accordingly, we urge the Council to follow the procedure specified by the High Court ruling in the case of Gallaher Homes, viz. first estimate the amount of land required to meet objectively assessed need without regard to supply considerations (OAN policy-off) and then take account of supply considerations to obtain OAN policy-on (or the “housing target” in the nomenclature of the Planning Advisory Service). Taking the policies of the NPPF as a whole and applying its protections of Green Belt land, those Green Belt sites which fail to satisfy one or more of the five purposes of the Green Belt should be excluded for re-designation for residential development unless the benefit of doing so were to outweigh the harm done to the Green Belt. Green Belt land so excluded should be taken into account in estimating the housing target and compliance with the 5-year housing land supply rule should be judged by reference to the housing target (not OAN policy-off). In this way, a balance can be struck between economic, social and environmental roles; we believe Knowsley Council can significantly reduce the loss of Green Belt and still achieve a sound local plan.

Sequential Development - Brownfield first, planned urban extensions after

9. CPRE Lancashire recommends that finding the most sustainable sites, with a brownfield first emphasis, and achieving quality urban design should be the highest priorities in the Local Plan. Knowsley ought to first prioritise its brownfield reserves in advance of bulldozing farmland and

wildlife havens and we suggest a brownfield target in the Local Plan. The NPPF Paragraph 111 also states Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land). It goes on to say local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land. In the 6 October press release Eric Pickles said *'Today's guidance will ensure councils can meet their housing needs by prioritising brownfield sites, and fortify the green belt in their area.'* CPRE Lancashire believes that Knowsley Council and the Examination Inspector should ensure brownfield first development is enshrined in the local plan.

10. CPRE Lancashire believes there is still a significant amount of brownfield land that can be used to accommodate new and replacement housing in the principal regeneration areas of North Huyton and Stockbridge Village, Kirkby, Tower Hill, Prescott, South Prescott and Knowsley Industrial and Business Parks. Knowsley is the fifth most deprived district in the country and regeneration is important. Release of Green Belt could hamper the chances of brownfield land in the poorest places being brought back into beneficial use. We continue to believe planning policy in Knowsley ought to galvanise previous public sector investment by steering new investment into urban areas not always defaulting to the urban and rural fringe.
11. Where brownfield land is unavailable then planned urban extensions are best, but CPRE promotes the use of comprehensive Green Belt Reviews to understand fully the likely impacts with full regard to sustainable development principles.

Green Belt Review

12. As you may know, Green Belt is important to CPRE as our countryside charity was involved in this planning policy designation being introduced by Government in the 1950s. Since its introduction Green Belt has been an effective tool for planners in maintaining open green space around our towns and cities for enjoyment - simply because it exists.
13. Green Belts have a higher concentration of public rights of way, broad-leaf and mixed woodland, Country Parks, Local Nature Reserves, and Registered (or historic) Parks and Gardens, than other land. The breakdown of land cover types in the Green Belts are approximately 35% of the area covered by arable / horticultural land; 25% improved grassland, and 14% semi-natural grass. We continue to believe strongly in the five purposes of Green Belt for regeneration, openness and separation, prevention of sprawl and encroachment, and permanence. We understand the health benefits of people being able to access recreation and leisure pursuits in local countryside and the heightened quality of life it brings.
14. We welcomed the announcement by Communities Secretary Eric Pickles and Housing and Planning Minister Brandon Lewis, on Monday 6th October 2014, who said brownfield sites should be prioritised and Green Belt protected. We believe the Government's intention should be enshrined in Knowsley Councils Local Plan policies.
15. If Green Belt must be released for development we would say it should be the subject of a proper strategic review and if land serves any of the five purposes it must have continued protection. In advance of such a criteria based evaluation process we cannot be sure of the relative value of the following proposed extensions:

- 1. Sustainable Urban Extension: Bank Lane, Kirkby
- 2. Sustainable Urban Extension: East of Knowsley Industrial and Business Parks, Kirkby
- 3. Sustainable Urban Extension: Knowsley Lane, Huyton
- 4. Sustainable Urban Extension: Edenhurst Avenue, Huyton
- 5. Sustainable Urban Extension: Land bounded by A58, Prescot
- 6. Sustainable Urban Extension: Carr Lane, Prescot
- 7. Sustainable Urban Extension: East of Halewood
- 8. Sustainable Urban Extension: South of Whiston & Land South of M62
- 9. Land Safeguarded for Future Urban Extension: Land at Knowsley Village

16. CPRE Lancashire campaigns to defend Green Belt and we would need to understand the significance of any of the above being released. Clearly there is an adverse impact to Green Belt purpose if it is developed.

'Best and Most Versatile Land'

17. Any strategic review of Green Belt should consider farmland quality as well as five Green Belt purposes. Land of highest agricultural quality (Grades 1, 2 and 3) should be retained to support the rural economy, rural employment and local food networks. Grade 1 farmland constitutes only 3.1% of all farmland and should therefore be treated as an irreplaceable asset of great value. We should not adversely and irreversibly develop on our most fertile lands as a matter of food security issue.

Phasing

18. If Green Belt must be released as a 'very last resort' for development, subject to a comprehensive Green Belt Review, we would argue that this land should be 'safeguarded' to later or following the plan period to support Brownfield land reuse and sustainable development principles.

19. We are opposed to the removal of a phasing policy for employment and housing land. We recommend that Green Belt sites and brownfield sites should be allocated to the 1-5, 6-10 and 11-15 year periods according to the desirability of retaining it (Green Belt) or developing it (brownfield).

Smart Growth

20. CPRE believes people deserve quality housing with sustainable transport links and adequate local amenities, such as doctors and shops. We therefore advocate 'Smart Growth', a sustainable approach to planning that emphasises compact and accessible urban communities and which opposes urban sprawl and car dependency. It seeks traditional ways of planning towns based around local services, ease of walking and cycling and good public transport, especially rail-based. It looks for ways to re-build our lost sense of community.

Summary

21. In summary, CPRE wishes Knowsley Council every success in the progression of the Local Plan which facilitates economic and social prosperity, and at the same time looks after the countryside. The different aims are not mutually exclusive. Key points raised are:

- CPRE believes adequate housing ought to be planned for reflecting up to date population projections;
- We urge for a stronger brownfield first approach to land use planning in Knowsley with use of a local brownfield target in the Local Plan that promotes the principles of 'Smart Growth'.
- CPRE Lancashire remains unconvinced that Green Belt release is justified due to downgraded population and household forecasts. But, if Green Belt land is to be re-designated we would wish to see a comprehensive Green Belt review to sensibly inform the selection of sites based on sustainable development principles.

22. Please let me know if you require further information.

23. Please also note that we wish to be involved in ongoing consultations.

Yours sincerely



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Appendix A - Detailed comments:

Ref MOO1 Paragraph 1.3 The Core Strategy also includes site allocations for areas to be removed from the Green Belt to meet future development needs, referred to as "Sustainable Urban Extensions" and on which further details are set out in chapter 6A. CPRE Lancashire believes it is premature for the additional text to be added.

CPRE Lancashire notes that Brownfield/Previously developed land is only referred to twice in the whole document.

Ref: M056B Paragraph 5.195.19 *Policy CS 3 complies with national planning policy for housing, including the need to have a flexible and responsive supply of housing land continually available. The policy particularly emphasises the importance of maintaining a "five year supply" of housing land, in accordance with national planning policy (including an allowance to address any shortfall accrued to date against the target within a five year period and an additional "buffer" of either 5% or 20%. The buffer required may change throughout the plan period in line with future monitoring. This will be reported on an annual basis via the Council's Strategic Housing Land Availability Assessment and/or Monitoring Reports). The approach of "plan, monitor, manage" will be employed, with the policy indicating that management of land should be efficient and effective whilst protecting brownfield regeneration priorities. Policy CS 3 also complies with the national policy priority to focus new development on previously developed land.*

Ref M042 page 36 Policy CS1, clause 1 *The spatial development of Knowsley to 2028 will be achieved by:*

- a. A focus on development within existing urban areas, with emphasis upon areas that are within or easily accessible from areas in need of regeneration;*
- b. Maintenance of the existing settlement hierarchy, including the role of Huyton / Stockbridge Village, Kirkby, Prescot / Whiston and Halewood as larger suburban centres, and of Cronton, Tarbock and Knowsley Village as rural villages;*
- c. Maximising Knowsley's contribution to the development of the Liverpool City Region and key sub-regional projects;*
- d. An efficient and sustainable use of land and infrastructure, encouraging where possible the reclamation and reuse of previously developed land; and*
- e. ~~A review of Green Belt boundaries to meet longer term~~ Removal of the Sustainable Urban Extensions identified in policies SUE 1, SUE 2, SUE 2a, SUE 2b, and SUE 2c from the Green Belt to help meet needs for housing and employment development, and maintaining the openness of remaining Green Belt areas.*

Reasons: To ensure consistency with the new policies SUE 1, SUE 2, SUE 2a, SUE 2b, SUE 2c concerning the Sustainable Urban Extensions.

CPRE Lancashire believes much more should be done to facilitate brownfield land redevelopment including the use of a Brownfield target. We are opposed to the identification of sustainable urban extensions in advance of a comprehensive Green Belt Review.

Ref M012 adds 1.28A Planning Practice Guidance was published in March 2014 as a web based resource to assist the implementation of the National Planning Policy Framework. The preparation of the Core Strategy has taken account of the specific requirements relating to plan making.

CPRE calls for reference in the Local Plan to the October Statement by the Communities Secretary to protect Green Belt and reuse Brownfield. This ought to be considered by the Examination Inspector.

Ref M014 adds An update to the Housing Strategy is under preparation for 2015 onwards.

CPRE Lancashire suggests the following replacement text “As part of the planning, monitor and manage approach the Local Plan evidence base for housing strategy will be subject to regular reviews in accordance with Government Planning Practice Guidance.”

Ref M020 This section also includes a range of policies relating to Sustainable Urban Extensions (SUEs) proposed in parts of Knowsley to meet residential and employment development needs.

CPRE has noted the inclusion of this text. We would hope land could be ‘safeguarded’ until after the plan period or refer to phasing later in the life of the plan based on plan, monitor and manage approach so it is generally understood that greenfield development is not being promoted in advance of brownfield land reuse. Promotion of greenfield land development which is currently protected by Green Belt designation is unsustainable.

Ref M057 (PM11) CPRE Lancashire supports the insertion of text to clarify the type of houses to be built should reflect needs identified in the Strategic Housing Market Assessment particularly concerning affordable housing in rural areas.

Ref M127 CPRE is supportive of the inclusion of the new text concerning Natural Assets and Biodiversity.

Ref M206 CPRE is pleased to see that the Forestry Commission will be consulted where development proposals contain or are likely to affect Ancient Semi Natural woodlands or Plantations on Ancient Woodland Sites.

Appendix B - WHAT IS SMART GROWTH?

Smart Growth is a sustainable approach to planning that emphasises compact and accessible urban communities and which opposes urban sprawl and car dependency. It seeks traditional ways of planning towns based around local services, ease of walking and cycling and good public transport, especially rail-based. It looks for ways to re-build our lost sense of community.

Here in the UK we are rightly proud of our historic towns and cities, our beautiful countryside and a planning system which protects the environment. But, for a whole string of reasons, our small and overcrowded country has spent 100 years building urban sprawl and creating a transport system fatally dependent on the car and the motor lorry. Despite its large areas of moor and mountain, the UK is a very densely populated country and England is now Europe's most densely populated country.

Parts of it are short of water and there is strong opposition to the urban sprawl which some argue is necessary to house our population. Climate change means we need to use less fossil fuel, yet we have a transport system which accounts for more than a quarter of our emissions, our public transport is expensive and often inadequate and the fabric and economies of many of our towns and cities have decayed.

Smart growth has its origins in a country where the damage done by sprawl, car dependency and urban deprivation far exceed our own mistakes - America. Yet extreme challenges often prompt the best solutions and over the past 20 years the Smart Growth movement has increasingly tackled these problems. Today, many US inner cities are regenerating economically and socially and being equipped with the rail-based public transport many of our cities desperately need. Cities are being remodelled to allow people to walk or cycle and are challenging America's fatal car dependency. Meanwhile its sprawling suburbs are feeling the chill wind of higher gas prices, falling house prices and social decline.

Recent years have seen discussions among environmental groups about ways of mirroring these successes here in the UK. A group of environmental NGOs formulated and agreed a set of principles for Smart Growth in the UK for use in planning, community development and urban regeneration.

THE SMART GROWTH UK PRINCIPLES

Plan Compact Communities

Smart Growth promotes well designed, compact, functional communities and rejects land-hungry sprawl and wastage of greenfield land.

Strengthen and direct development towards existing communities

Smart Growth emphasises use of communities' existing infrastructure and resources and conserves open spaces and urban fringes.

Provide sustainable transport choices

Smart Growth reduces dependence on road transport and increases opportunities for walking, cycling and public transport. Towns, cities and villages should be pedestrian -friendly and rail-accessible.

Protect the unbuilt environment

Smart Growth believes our countryside and open space is a precious environmental, social and economic resource. It should be protected and husbanded if we are to move towards a more sustainable society. Squandering it will create, not solve, problems for our towns and will do nothing for our national economy.

Foster distinctive, attractive communities with a strong sense of place

Smart Growth encourages communities to develop their own identity and vision, respecting their cultural and architectural heritage. It supports human-scale development and opposes large, monolithic developments, out-of-town retailing and 'big box' architecture.

Mix land uses

Smart Growth supports a sensible mix of land uses to suit communities and their daily needs.

Encourage communities to flourish and grow

Smart growth supports mixed-income, mixed-age, inclusive communities that take responsibility for their own development. Local communities should be developed to make them more self supporting.

Create a range of housing opportunities and choice

Smart Growth supports quality living for people of all income groups, ages and needs. We want human scale development at appropriate densities to support sustainable transportation and local facilities.

Make development decisions fair and economically inclusive

For communities to successfully implement Smart Growth they must ensure all three sectors of the economy - public, private and community - function successfully and sustainably.

Text reproduced from Smart Growth UK website www.smartgrowthuk.org