

**KNOWSLEY LOCAL PLAN
CORE STRATEGY EXAMINATION**

**Matter 2: Spatial Development
Strategy and Principles**

**Smiths Gore on behalf of
The Knowsley Estate
(ID ref 72)**

October 2013

Knowsley Local Plan Core Strategy – Examination Hearings

These representations are submitted on behalf of The Knowsley Estate and are in response to the Submitted Knowsley Local Plan Core Strategy and minor changes published in July 2013. The submitted representations seek to address the Matters and Issues identified by the examination Inspector as set out below.

Overall it should be noted that the Knowsley Estate broadly support the plan and its overall strategy and there is little between the Council and our client. However, where there are differences these relate to the core strategy's ability to respond appropriately to the need to deliver housing and employment land in a timely manner and in a manner consistent with the National Planning Policy Framework's (NPPF) requirement to meet the full objectively assessed need for market and affordable housing in the housing market area and to "boost significantly the supply of housing." (NPPF para. 47).

The Knowsley Estate owns land within the Knowsley Local Plan area and there are three sites under the Estate's ownership which have been assessed and reviewed through the Council's Green Belt Technical Report. These sites have been assessed by the Council as being suitable for Green Belt release and our client concurs with this view. Our client is committed to bringing forward these development sites to support the housing and employment land needs of the borough and is pleased to be working with the Council to secure the delivery of these sites. The land owner envisages these sites will bring forward high quality and inclusive design as sustainable developments to the benefit of the area, its residents and visitors.

Matter 2: Spatial Development Strategy and Principles

Issue: Whether the strategy of development within urban areas (focusing on regeneration areas) followed by urban extensions to meet longer term needs, represents a sustainable approach to growth which pays sufficient regard to the environmental and other constraints of the borough.

1. On behalf of our client the Knowsley Estate we consider the overall strategy of the plan to be sound. Our main concern is that although the overall plan strategy is sound the mechanism for delivery is flawed. The principle of focusing development on existing urban areas 'followed' by urban extensions is driven by a strong desire to prevent any undermining of the Council's regeneration objectives. Clearly the opening up of any greenfield sites is considered to directly threaten regeneration projects. However, we contend that the prime consideration of the plan is to provide for the delivery of homes and jobs needed for the area.
2. Under matter 3 we explore the Council's five year land supply and the historic shortfall of housing provision since 2003. There are also questions to be answered as regards the assessment of objectively assessed housing needs and whether the annualised 450 homes to 2028 actually represents an under-provision. With regard to meeting housing needs and employment provision we consider the plan should be bringing forward Green Belt sites at an early stage within the plan process and not as longer term sites.
3. NPPF advises at paragraph 83 that Green Belt boundaries should only be altered in exceptional circumstances. One of the 12 core planning principles set out in NPPF is to identify and then meet the housing, business and other developments needs of an area. The Council has undertaken a thorough Green Belt Review and has determined that it can meet its development needs by taking some land out of the Green Belt for development whilst still maintaining the essential purpose of the Green Belt in this area to:
 - Prevent unrestricted sprawl;
 - Prevent towns merging;
 - Safeguarding the countryside; and
 - Preserve the character of historic towns.
4. The Council is however naturally cautious of releasing edge of urban land that in their view might thwart urban regeneration objectives and thereby conflict with the final stated aim of Green Belts to:

- Assist in urban regeneration by encouraging recycling of urban land.
5. Hence the Council's strategy is to hold back Green Belt releases until such time as its release would not undermine the urban regeneration objectives. However, as set out under Matter 5 the mechanism for releasing Green Belt land is insufficiently clear or robust to ensure delivery of needed homes or employment provision, nor is there a proven case that Green Belt release will undermine regeneration objectives.
 6. The Council's requirement to provide for its housing and other development needs amount to exceptional circumstances necessary to review the Green Belt boundary in this way. Given that the essential purposes of the Merseyside Green Belt are not undermined by the suggested releases the Green Belt land release is an appropriate way for Knowsley to provide for its housing needs. Where we are at odds with the Council is the urgency and need for this to be effected through the Core Strategy Local Plan.
 7. It is clear that Green Belt land will have to be released to meet currently identified housing and employment needs over the plan period. Whilst one of the stated purposes of Green Belts is to assist in urban regeneration, by encouraging the recycling of urban land, we would argue that the releasing the necessary Green Belt land at this point will not jeopardise regeneration schemes. There is clearly a significant and unmet housing need in Knowsley which has existed for some time. Significantly restricting land supply will leave those with housing needs in the area unhoused. Increasing the supply of housing land could support economic regeneration by reinvigorating the local housing market by allowing for choice of sites and boosting investment into the local economy.
 8. On behalf of our client we firmly believe that the Core Strategy should identify Green Belt land release by allocation in the Core Strategy both to support required housing delivery and support regeneration objectives for the area. The plan is currently unsound in this regard as it is not positively prepared or effective in providing for housing needs, nor is it consistent with National Planning Policy in boosting significantly housing supply.
 9. Policy CS 1 Spatial Strategy for Knowsley at part 1. e. should be reworded as:

'e. A review of Green Belt boundaries to meet ~~longer-term~~ needs for housing and employment development by allocation of strategic sites, and maintaining the openness of the remaining Green Belt areas.'

