



Knowsley Local Plan: Core Strategy Examination

**Written Statement
Relating to Matter 2: Spatial Strategy**

In respect of
Land off Fox's Bank Lane, Whiston
(In Support of Release of Sites from the Green Belt
and Reallocation for Residential Development)

October 2013

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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').

It specifically addresses the Inspector's Matter 2 (Spatial Development Strategy and Principles) and the issue of: *"Whether the strategy of development within urban areas (focussing 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."*

This Statement also addresses the additional questions raised by the Inspector in relation to Matter 2. It concludes why the Core Strategy is currently unsound and what changes are required to make it sound.

1.2 Context

The context for this Statement concerns the parcels of land (edged red below), located to the west of Fox's Bank Lane, Whiston.

These were the subject of representations submitted to earlier stages of the KLPCS process on behalf of the landowners by Jones Lang LaSalle and Frost Planning Ltd.



Site Location Plan

Both sites form part of a larger strategic site (“reserve location”) for Green belt release within the KLPCS (reference: KGBS14 South of Whiston), as identified below.



-  Boundary of Alternative Green Belt Location
-  Potential Developable Area (where applicable)
-  Boundary of Knowsley Green Belt Study Location
-  Listed Buildings
-  Local Wildlife Sites
-  Conservation Areas
-  Knowsley Boundary

1.3 References

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

2 Response to Matter 2

The sequential approach to promoting development in urban areas (focussing on Priority Regeneration Areas) ahead of urban extensions manifests itself in policy CS1. Whilst in many circumstances this might represent an appropriate spatial strategy for any Local Plan, the situation in Knowsley requires a very different approach. In our opinion, policy CS1 needs to be altered to better reflect the chronic housing land situation and the need to meet development needs both now and throughout the Plan period.

The Evidence Base points to the fact there are “*exceptional circumstances*” in Knowsley which justify the early release of Green Belt land to meet the short, medium and long term development needs throughout the Plan period. This is having particular regard to Knowsley's development requirements for housing and employment development as outlined in Policy CS 3 'Housing Supply, Delivery and Distribution' and Policy CS 4 'Economy and Employment' respectively.

We note in particular that the latest Strategic Housing Land Availability Assessment ('SHLAA') and the Joint Employment Land and Premises Study conclude that there is not enough suitable land for housing and employment development within the existing urban areas of Knowsley to meet development requirements up to 2028. Furthermore, the SHLAA suggests that without reviewing the Green Belt boundary, Knowsley would be unable to maintain a 5-year "deliverable" supply of housing land “beyond the short to medium term”.

The case for Green Belt release is therefore clear and unequivocal. The concern we have is the phasing of such release.

We have examined the housing need and supply chain to 2028. Based on the persistent and considerable under-delivery of housing since 2010, compounded by our serious doubts regarding the 'deliverability' of a large number of sites identified within the SHLAA for years 0-5 (and even years 6-10), we firmly believe that policy CS1 should advocate a 'substantial and immediate' release of Green Belt land for housing. Thereafter, policy CS1 should allow Green Belt land to be released throughout the Plan period and certainly well ahead of any housing land shortfalls.

Put simply, the case for adopting a rigid 'urban first' spatial strategy (as policy CS1 currently advocates) through a sequential approach to site release is countered by the need to meet development needs both now and over the course of the Plan period in a properly planned, effective and timely manner. Our general objection is therefore that the KLPCS places too much emphasis on restricting development to within urban areas for at least the first 0-5 years' period of the Plan. This risks the Plan failing to meet its objectively assessed housing needs in the short, medium and longer term. Indeed, the timing and mechanism for phased release in years 6-10 and beyond are also uncertain.

As an example, one of the stated 'Spatial Development Priorities' listed under policy CS1 is to “*a. Rebalance the housing stock by providing a wide choice of new market sector and affordable housing with supportive services and facilities appropriate to needs*”. However, given the non-viability of many 'urban' sites identified in the SHLAA, and thus their limited potential to deliver either open market / affordable housing and wider infrastructure improvements, this ambition is unlikely to be realised in the short or even medium/longer term of the Plan period unless an early and substantial phase of Green Belt land is released immediately.

The current housing land supply situation in Knowsley underlines this concern. As evidenced by the KLPCS (Page 45, Figure 5.1 Knowsley Housing Trajectory), the borough is already significantly under-performing against its annualised delivery target over consecutive years since 2010. Notwithstanding the underlying economic conditions, this level of under-performance strongly suggests that there is an inherent weakness in the supply

chain of urban sites which the Council is relying on to come forward. This is not surprising when the SHLAA is assessed. A wide range of sites, both large and small, are expected to be deliverable over the next 5 and 10 years. However, many of these sites are unlikely to come forward within the next 5 or even 10 years. The result, if unchecked, will be a worsening shortfall in housing delivery (including affordable housing provision and wider infrastructure funding) for at least the first 5 years of the Plan period and most likely beyond (allowing for lead-in times, site preparation, other external market influences, etc.). An early and substantial release of Green Belt land for housing in a prime market location during the early years of the Plan period would prevent this.

In summary, policy CS1 (and consequently policies CS3 and CS5) need to respond more positively and effectively to the housing needs of the borough both now and throughout the Plan period. In light of the already chronic and deepening shortfall in housing land delivery, a central aim of the KLPCS should be to correct this as soon as possible and maintain a healthy supply thereafter. The optimum solution to this is for policy CS1 to advocate an early and substantial release of Green Belt land for housing in a single prime market location, giving certainty to delivery and wider socio-economic benefits (e.g. affordable housing provision). For reasons more fully outlined in our response to Matter 5, we consider that Site KGBS14 would be sequentially best placed to perform such a role.

3 Response to Additional Questions Raised by the Inspector in Relation to Matter 2

3.1 Question 2.1

No - for reasons outlined in section 2 of this Statement.

3.2 Question 2.2

Response – no comment.

3.3 Question 2.3

Response – no comment.

3.4 Question 2.4

The strategy for Green Belt ‘review’ in policy CS1 is unclear and generally inconsistent with the NPPF. Policy CS1 (1.e) states that the release of sites from the Green Belt will be kept under ‘review’ to facilitate longer term development needs as and when needs arise. We consider this ‘drip-feed’ approach is incorrect, ineffective and would be impractical. It would lead to “a first past the post” planning system and one that would not deliver the variety and choice required to provide the boost that the housing market within the borough clearly requires.

Paragraph 83 of the NPPF is clear that where exceptional circumstances exist (e.g. housing land needs) Green Belt boundaries should be reviewed through the Local Plan (not post-adoption). In other words the KLPCS is the correct vehicle for releasing these sites ‘now’ to meet current and future development needs during the Plan period. Further ad-hoc reviews of the KLPCS should not be necessary and would otherwise seriously jeopardise the Plan’s ability to counter future housing land shortfalls in a timely and effective manner.

The release of Green Belt land for development does satisfy the “exceptional circumstances” test of national policy. By any reasonable definition, the demonstrable inability of existing urban areas to deliver and absorb future development needs over the course of the next Plan period has to be considered an exceptional circumstance. There are no pre-existing ‘safeguarded land’ reserves which can be relied upon. The urban area is effectively ‘shrink-wrapped’ by Green Belt and has been since 1983. If Knowsley is to fulfil its development needs to 2028 then the timely release Green Belt land in the short, medium and longer term is the only safety valve which can achieve this.

The release of Green Belt sites should certainly not be restricted to facilitating “longer term” development needs only. For the reasons explained in our response to Matter 3, we consider that the trigger of deliverable land supply dipping consistently below 5 years has already been established. We therefore do not agree with the Council’s assertion that they have a 5 year supply at present. In our opinion their current SHLAA grossly overestimates their land supply position. We forecast that the supply situation will worsen rather than improve over years 0-5 of the Plan and most likely beyond if the Green Belt supply chain is restrained in the way policy CS1 proposes. In our view there is a compelling need to release an immediate and substantial amount of Green Belt land now, rather than wait for 6 years.

3.5 Question 2.5

To be considered ‘sound’ the Core Strategy should adopt a more flexible and positive approach to the release of Green Belt sites for development. The preferred emphasis of policy CS1 should be on providing a reliable steady, diverse and competitive supply of deliverable housing land. This can only be achieved by the release of

Green Belt land throughout the Plan period, including a substantial early release of land in years 0-5 to correct the backlog and compensate for many urban sites which are unlikely to come forward in the short to medium term.

The borough's housing needs will not be successfully realised without this alternative approach being applied. The KLPCS will only meet its housing targets (including both aspirational and affordable housing), its employment targets (both economic and investment potential) and wider infrastructure improvements across the borough (via CIL/other mechanisms), if it positively embraces and proactively plans for the release of Green Belt land in the way we propose.

3.6 Question 2.6

We agree that policies CS1 and CS2 should list 'meeting housing and employment needs' as a core principle.

3.7 Question 2.7

In our opinion insufficient provision has been made for alternative strategies. The KLPCS should take account of the fact a significant number of its windfall sites and urban housing allocations will most likely not come forward within at least the first half of the Plan period for a variety of reasons, principally commercial viability. In which case, in line with the NPPF, it is imperative that there is an in-built contingency for Green Belt land to be released immediately and throughout the Plan period (i.e. not simply to serve 'longer term' needs). At present, the policies are so restrictively worded that it would be difficult for the Plan to respond effectively through the release of Green Belt sites during years 0-5 or even thereafter.

4 Conclusions

4.1 Which part of the Core Strategy is Unsound?

Policy CS1.

4.2 Which Soundness Test does it Fail?

Not positively prepared. Not justified. Not effective. Not consistent with national policy.

4.3 Why does it fail?

- Not positively prepared because policy CS1 will fail to meet objectively assessed housing needs (including affordable housing provision) and infrastructure requirements throughout the Plan period, and particularly within years 0-5.
- Not justified because the evidence points firmly towards the need for an alternative strategy which should mean the immediate and substantial release of Green Belt land in years 0-5. Policy CS1 is presently reliant on a flawed evidence base – specifically the current SHLAA.
- Not effective because policy CS1 will fail to meet objectively assessed needs for housing over years 0-5 and risks failing to meet longer term needs for housing over the course of the Plan period.
- Not consistent with the NPPF because policy CS1 does not positively seek the opportunity to meet the objectively assessed housing and wider infrastructure needs of the borough throughout the Plan period, particularly in relation to paragraphs 14 and 47 of the NPPF.

4.4 How can the Core Strategy be made Sound?

Refer to response to Question 2.5 and see below.

4.5 What is the precise change/wording that is being sought?

Policy CS1 needs amending as follows:

- # 1 e. (and supporting narrative) should say: *“The immediate and substantial release of Green Belt land identified in Policy CS5 (in years 0-5) to meet immediate development needs for housing and employment development, and further release of Green belt land thereafter to ensure all objectively assessed development needs are met throughout the Plan period ”*

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