

KNOWSLEY CORE STRATEGY EXAMINATION

MATTER 2: SPATIAL DEVELOPMENT STRATEGY AND PRINCIPLES

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ON BEHALF OF JUNCTION PROPERTY LTD

OCTOBER 2013

1. Question 2.1: Settlement Hierarchy

- 1.1 JPL supports the Policy CS1 principle of maintaining the settlement hierarchy and focussing growth in and around the main urban areas. It however considers that the strategy should allow the early release of urban extensions as this is the only way in which the full qualitative and quantitative development needs of the Borough can be met. Our Matters 3 and 4 statements give further details but it is worth emphasising that the housing trajectory at CS page 44 shows 'Green Belt' sites will need to start producing significant numbers of dwellings by 2018/19 at the latest. Given the lead-in times for development, the first releases of Green Belt would have to occur shortly after the adoption of the CS if the trajectory is to be met. This is not consistent with the reference to "*longer term*" in Policy CS1.

2. Question 2.2: The Spatial Nature of the Strategy

- 2.1 JPL considers that the strategy is sufficiently spatial, and it does address "*the particular characteristics, roles and functions of individual settlements and areas*" (so far as they can be distinguished). This question must be put in the context that none of the settlements are separate local housing or employment markets within the meaning of the NPPF (PG01).

3. Question 2.3: Regeneration Areas.

- 3.1 This is a question for the Council to answer initially.

4. Question 2.4: Green Belt

- 4.1 The NPPF (83) specifically allows for the review of adopted Green Belt boundaries in Local Plans. It however requires that "*exceptional circumstances*" are shown. JPL considers that the exceptional circumstances in Knowsley are:-

1. The need to meet the full objectively assessed needs of the Borough over the plan period, including qualitative needs. Our Matters 3 and 4 statements give more details.
 2. The social, economic and community benefits to the Borough from the development proposed.
 3. The overall lack of harm to essential Green Belt purposes from the proposed releases. The extent of harm will of course need to be assessed for each proposed exclusion. However JPL considers that the Green Belt Study (EB08) demonstrates that the proposed scale of release would not harm the fundamental objectives of the Green Belt in Knowsley which are to check the unrestricted sprawl of large built-up areas and prevent towns merging into one another.
- 4.2 The Ministerial Announcement on Housing and Growth makes clear the Government's support for review of Green Belts to support growth, saying:-

"As has always been the case, councils can review local designations to promote growth. We encourage councils to use the flexibilities set out in the National Planning Policy Framework to tailor the extent of Green Belt land in their areas to reflect local circumstances. Where Green Belt is considered in reviewing or drawing up Local Plans, we will support councils to move quickly through the process by prioritising their Local Plan examinations"

- 4.3 For the reasons already given, we consider that the use of Green Belt land excluded from the Green Belt should not be limited to "*longer term*" needs.

5. Question 2.5: Alternative Strategies

- 5.1 There is no evidence – compelling or otherwise – that the growth sought by the CS can be achieved without requiring substantial releases from the Green Belt.

6. Question 2.6: Development Principles

- 6.1 JPL considers that Policy CS1 and/or CS2 should make reference to meeting the housing and employment needs of the Borough consistent with NPPF paragraphs 14, 17, 21, 47, 156, 159, 161 and 182.
- 6.2 A reference to minimising the loss of Green Belt land would not be consistent with national policy. Instead the emphasis of the NPPF (39) is on maintaining "*permanence*." When, as in Knowsley, Green Belt boundaries are being reviewed, "*permanence*" will often require excluding more land than is necessary to meet needs in the plan period so that "*Green Belt boundaries will not need to be altered at the end of the plan period*" (NPPF (85)).
- 6.3 JPL accepts that the development principles set out in Policy CS2 should apply to subsequent stages of the Local Plan as well as to individual development proposals.

7. Question 2.7: Flexibility

- 7.1 If the CS maintains its reference to the "*longer term*" phasing of Green Belt releases, it is essential that some flexibility is incorporated into the document that allows the release of some or all of the broad locations before the adoption of the Allocations DPD if development in the existing urban area does not come forward as expected (which JPL considers is highly likely given past performance) or the Allocations DPD is delayed for whatever reason.

- 7.2 JPL notes that the Wigan Core Strategy Inspector proposed a similar alteration to allow its Broad Locations to come forward in advance of an Allocations DPD in order to create a five year supply of deliverable housing land.