

This statement on behalf of Weston House sets out responses to the Inspector's Questions on **Matter 2**. They are arranged by Issue and question number using the Inspector's numbering.

This Position Statement relates only to the land known as Weston House on Lydiate Lane, Halewood, and not to land owned by United Utilities on which joint representations have previously been made. Those representations still stand insofar as they relate to Weston House.

**Issue 1: 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.**

**Q2.1**

The sound assessment of the socio economic and environmental characteristics of areas and townships should be the fundamental building block and evidence base upon which a strategy which identifies growth in the most appropriate location is built. The principle of this is not disputed and in fact is specifically endorsed. However, we do not consider that this is what has occurred in the Core Strategy. As our original representations set out at section 4.2, there has not been a proper settlement role and function study done and this evidence base does not exist. Consequently, we contest not the principle but that the Council purports to have applied it, when in reality they are using a capacity based approach as justification for their choices. This is shown in the change in figures for Halewood between those in the preferred options and the submission version which are entirely the result of a recalculation of the supply and uses a simplistic approach rather than a robust and credible evidence base.

We do not support an approach which seeks to split the growth to townships according to their population. This is not an appropriate approach because it does not respond to the needs and ambitions of individual places. If the socio economic characteristics of Halewood have been identified it is not clear how they have been taken forward into the strategy. This is particularly pertinent in relation to jobs growth and the lack of consistency between the strategy for housing compared with that for employment. This is set out at paragraph 4.3.10 of our representation statement and demonstrates further that the approach taken by the Council is entirely supply-led rather than as a result of a coherent understanding of the place and its needs.

For information the 2011 Census results show that 20,116 people lived in Halewood, in 8,382 households. There has been a 3% reduction in population since the last Census, from 20,701 in 2001, to 20,116 in 2011, in line with the Borough overall. According to the 2011 Census Halewood contains 13.8% of the population of Knowsley (145,900).

## **Q2.2**

This question is fundamentally linked to the points set out above and in Matter 3 Issue 2 Q 3.6. It is clear that the approach taken by the Council is not a proper spatial strategy. The approach does not seek to understand and appreciate the character, role, function, inter relationships, opportunities or constraints presented by places. As a result of this it fails to respond and reflect this and does not identify development for places that seek to reinforce and influence change, which is what a proper spatial strategy should do. Consequently the approach is entirely supply driven and as a result of the locations of sites and incorrect interpretation of Green Belt broad locations it is an 'accidental spatial strategy'.

As a result of this accidental spatial strategy places such as Halewood are not appropriately provided for. There are numerous dangers of failing to provide adequately for the growth of areas and specifically for failing to cater for adequate housing and job opportunities. The population of Halewood, and Knowsley is aging in line with national population trends, and there has been a significant decline since 2001 of the population of those aged 30-44. The assessment of components of population change set out within the Housing Market Update 2013 at paragraph 5.1.6 demonstrates that there has been a net loss of 600 persons of working age over the last year. The 2011 based subnational population projections indicate that the working age population of Knowsley will continue to decline as a proportion of the overall population to 2021. If the Council wish to retain the economically active population and achieve their objective as a 'borough of choices' and achieve 'a sense of place and community, having sustainable, diverse, more prosperous and healthy populations', they need to do more to make provision for the townships such as Halewood, in order that they can achieve their economic and housing objectives.

## **Q2.4**

The Hunston Judgement issued on 5 September 2013 is clear that the housing requirement can clearly provide the exceptional circumstances necessary, and that the objectively assessed need should be identified properly and be free of constraints. The judge also confirmed that the Green Belt Policy is not an outright prohibition on development in the Green Belt. Rather it is a prohibition on inappropriate development in the absence of very special circumstances.

Even without a proper and Framework-compliant assessment of objectively assessed needs, it is clear from the Council's SHLAA and Housing Position Statement that the Council cannot meet the (inadequate) figures they identify beyond the first five years of the plan and require the release of Green Belt to deliver development in year 6 and beyond. Consequently, there are clear exceptional circumstances that exist and Green Belt sites should be identified for release.

## **Q2.5**

While we do consider the strategy to be unsound, this can be remedied by an improved understanding of settlements and townships and allocating more mixed use development particularly at Halewood. The basis of the current strategy relies on the robustness of the SHLAA and the assessment of deliverability. Evidence that growth could be achieved without using Green Belt sites would consist of considerably more sites to have been identified and deemed to be suitable, available and achievable. No evidence of this type has been provided to demonstrate that completions were higher than previously thought, that discounts should be reduced, densities increased, and a windfall rate included. These sources would have to make up the considerable shortfall that currently exists of 1836 dwellings over the plan period, based on the Council's own disputed figures.

The Green Belt is not sacrosanct and there is no reason why changes to the Green Belt should not be made within this development plan. This is explicitly provided for in the NPPF and has always been enshrined within national policy. If Green Belt boundary changes are needed and if parts of the Green Belt are not fundamental to the integrity of the Green Belt or to the original reason for having this Green Belt, and if change delivers the best strategy, then it is an acceptable and entirely appropriate approach. Any other view would be to follow some simplistic view of the Green Belt as solely a means of preventing development when the original concept and justification for Green Belt was as a strategic tool for shaping patterns that worked as settlements. In updated terms this means that the role of Green Belt is to assist in creating sustainable patterns of development.

## **Q2.6**

Policies CS1 sets out the spatial strategy. The reason why there is no reference to meeting housing and employment needs is presumably because this has not been a driver in the establishment of the spatial strategy. It is clear that the strategy is an accidental spatial strategy which is largely driven as a result of capacity and a flawed interpretation of the green belt, rather than as an assessment of the role and function of townships and the needs that exist within them. The plan should be amended to focus more on how the housing and employment needs of different areas could be provided for. This would be a more positive approach which would result in a spatial strategy that responds to the needs and is sound because it would be in accordance with the NPPF.

Having said this, the policy in 1e on page 35 of the Submission Document July 2013 properly set out the need for a review of the Green Belt to meet the needs for housing and employment development over the whole life of the plan. This is entirely appropriate and properly addresses the fundamental issues within the plan of releasing Green Belt land to meet needs. We do not agree that minimising the loss of Green Belt land is a fundamental planning principle. If there are exceptional circumstances that justify the release of Green Belt land then a review is necessary and change becomes entirely appropriate. The exceptional circumstances are undoubtedly established



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through the need for new development. Consequently the Council correctly addresses the key issues of Green Belt review rather than minimising loss.

#### **Q2.7**

There is currently no provision made for alternative strategies to be implemented and the plan does not currently provide enough flexibility to deal with non delivery of sites, or changes in circumstances. While policy C3 sets the housing figure of 8,100 which is recognised as a minimum the distribution is constrained and appropriate phasing mechanisms are not set out. This links with Matter 3, Issue 2 Q 3.7 which identifies the need for contingency arrangements and more robust trigger mechanisms to ensure the release of additional land as appropriate to meet the needs that exist.

Flexibility and contingency can easily be built into the plan by identifying additional land to be released from the green belt, such as the site at Lydiate Lane, Halewood. The use of reserve sites and safeguarded land and their release according to the implementation and delivery of the five year land supply has been commented on in our original representations at paragraph 2.1.23 – 29. In addition to the identification of further sites, there also needs to be a more thoughtful approach to their release. Effectively the only trigger mechanism for their release is the need to maintain a deliverable five year land supply. Given the time lag associated with such sites which are likely to take at least 3 years until they start to realise development, there is an inevitable difficulty of relying on these to provide the continuous five year land supply when this is the figure being used to trigger their release. We would suggest that a more regular and refined mechanism related to completion rates and objectively assessed need should be developed and set out so that sites can be brought forward without delay and according to specified monitoring targets.