

## APPENDIX 1

### HOUSING SUPPLY OVER THE PLAN PERIOD

A1.1 The 2013 Housing Position Statement (HPS)(SD22) sets out the following supply (risk assessed) outside the Green Belt to meet the housing requirement over the plan period:-

Sites with planning permission	3116
Allocations	743
SHLAA sites	3017
Total	6876

A1.2 JPL has significant concerns about the developability of much of this supply for the following (overlapping) reasons:-

1. Many of the sites are concentrated in areas of low market demand, including parts of North Kirkby, North Huyton and Stocksbridge Village. The market is capable of taking up some of the more attractive sites in these areas but not at the scale or rate envisaged by the HPS. In particular, the market would not develop the smaller sites identified in areas of predominantly public sector housing.
2. Some 743 dwellings are on allocations rolled forward from the Knowsley UDP which was adopted in June 2006. These sites have not come forward for development in the intervening 7+ years and, according to the Council, none have planning permission. Of the six sites, the Council's Viability Study shows one is unviable and three are at best marginal. We consider that there is a significant risk that these sites will not contribute to housing land requirements to the extent suggested by the Council.
3. Over a third of the supply is in the form of Council owned land. (2318 dwellings). The Council has a programme of disposals but this programme is very ambitious compared to past performance and there must be serious question marks over the ability of the Council to meet its programme and the willingness/ability of the private sector to respond, especially as many of the potential disposal sites are in areas of low demand. In addition, a substantial proportion of the sites within the disposal programme are currently open spaces or school playing fields. Virtually all these greenspaces are currently subject to protection by the UDP and none have planning permission. All would need to be the subject of appraisal against the criteria set out in Policy CS21 including impacts on visual amenity, biodiversity and the local community. In this regard, some of the sites are within important greenspace corridors within the Borough, and most make some contribution to the overall visual amenity of their areas. Until a full appraisal has been carried out applying the criteria of CS Policy 21, there must be considerable uncertainty about how much development the open space sites identified in Appendix D will actually contribute in the plan period. It seems extremely unlikely that all will come forward. In this regard, PG32 makes clear that "*the borough's expansive green infrastructure network is amongst its greatest assets.*"

4. Some of the sites are subject to severe constraints, such as restricted access including KO227 Station Road, Huyton; KO421 Playing Field Kirby; KO423 Knowsley Road, Heywood; KO424 Garth Road, Kirkby; KO425 Pitsmead Road, Kirkby; KO427 Brook Hey drive, Kirkby and Ormonde Crescent Kirkby. Others are in active use and may well not come forward for housing including KO26 The Swan Public House, Huyton; and KO228 Willis House, Prescot.
5. Many of the sites are unlikely to be viable for development even if reduced levels of affordable housing are acceptable. This is demonstrated by the HPS where many of the sites are deemed marginal or unviable, even at a density of 40 dwellings per ha which may well be too high for the market.

A1.3 In conclusion, there must be great uncertainty about the genuine developability of a substantial part of the Council's identified supply outside the urban area. This reinforces the need for a mechanism to allow the early release of some or all of the sites proposed for exclusion from the Green Belt.

## APPENDIX 2

### FIVE YEAR REQUIREMENT

- A2.1 This Appendix looks at whether the SCS will provide a five year supply on adoption.
- A2.2 The HPS (Table 3.12) calculates the five year requirement at 1<sup>st</sup> April 2013 as being 2700 dwellings. However, this takes no account of the need to make up the shortfall which has arisen since the start of the plan period in April 2010. This shortfall is equivalent to 743 dwellings. In line with normal practice, this shortfall must be added to the five year requirement. The Draft NPPG makes clear that local planning authorities should aim "*to deal with any under-supply within the first five years of the plan period where possible.*" Where this cannot be met in the first five years, it says that local planning authorities will need to work with neighbouring authorities "*under the duty to cooperate.*"
- A2.3 As a result, the five year requirement is 3443 dwellings for the period 2013 to 2018.
- A2.4 As the HLS only identifies a deliverable supply of 3017 dwellings, it must follow that there will not be a five year supply on adoption. Even on the Council's supply figures, there is only 4.38 years. This is a significant shortfall which would trigger paragraph 49 of the NPPF.
- A2.5 For the record, the shortfall will be even greater at 1 April 2014 because there is no expectation even in the Council that completions will match the CS housing requirement in 2013/14.
- A2.6 JPL considers that the shortfall at 1 April 2013 is significantly greater than 4.38 years because many of the sites identified in the Council's five year supply do not meet the deliverability criteria set out in the NPPF for the following reasons:-
1. A significant proportion of the larger SHLAA sites (i.e. those without permission) are in Council ownership and are not programmed for disposal until 2015/16 at the earliest. Consequently, such sites cannot possibly meet the requirement of the NPPF that they "*should be available now.*" Examples are KO451 Longview School Playing Fields, Huyton; KO379 St Agnes School, Huyton; KO43 Ennerdale Close, Kirkby and KO295, St Leo's Church, Whiston.
  2. The HPS shows many of the sites in the five year supply to be of marginal viability or unviable, even at a density of 40 dwellings per ha. This is before application of policy requirements which are likely to be mandatory part way through the five year period (such as zero carbon homes). As viability is a key test for deliverability, this is a serious matter.
  3. Many of the larger SHLAA sites are designated by the UDP as urban greenspace where policy protection will apply. After adoption of the CS, this policy protection will derive from Policy CS21 which requires consideration of matters such as impacts on visual amenity, biodiversity and community character. There is no evidence that the Council as planning authority has undertaken this assessment. In consequence, the sites cannot fulfil the requirement of the NPPF that deliverable sites "*offer a suitable location for development now.*"

4. In applying timescales for building activity the HPS assumes that a significant number of completions will take place on currently Council-owned sites in the year following disposal. This is not realistic. Even HPS Table 3.11 assumes that it will take at least 18 months to achieve the necessary permissions and undertake the site works necessary before the first completion. As a result, the phasing of most of the large scale sites in the five year supply currently without permission needs to be put back by at least 1 year.

A2.7 On this basis, we consider that the Council's genuine supply of deliverable sites will be well under 4 years at adoption.