



Supplementary Statement in Response to Matter 5: Green Belt

Our ref 41205/02/MW/CSi
Date 21 October 2013
To Programme Officer
From Nathaniel Lichfield & Partners
Copy Taylor Wimpey UK Limited and Redrow Homes Limited [ref: 1104]

**Subject Knowsley Local Plan Core Strategy Examination:
Matter 5: Green Belt**

1.0 Introduction

1.1 Nathaniel Lichfield & Partners [NLP] were instructed by Taylor Wimpey UK Limited [Taylor Wimpey] and Redrow Homes Limited [Redrow] to make representations on the Publication Knowsley Local Plan Core Strategy [PWLLP] in 2012.

1.2 The following supplementary statement outlines the further submissions of Taylor Wimpey and Redrow in relation to the forthcoming Examination in Public [EiP] hearing session concerning Matter 5 (Green Belt). Separate submissions have been lodged on behalf of Taylor Wimpey and Redrow Homes to address Matter 2 (Spatial Development Strategy and Principles) and Matter 3 (Housing Provision). The representations are also supported by a Housing Topic Paper where NLP has undertaken its own assessment of the housing requirements for the Borough in terms of meeting objectively assessed needs.

1.3 This statement supplements Taylor Wimpey and Redrow's earlier representations in relation to the Green Belt [Reference 1104].

1.4 As we set out in our 1104 representations Policy CS 5 fails to meet the following tests of soundness because at present:

- 1 It is not justified or effective for the following reasons:
 - i The policy, as currently worded, does not provide an effective mechanism for the release of "reserve" locations if regeneration sites fail to deliver within anticipated timescales;
 - ii The policy proposes to delay a review of Green Belt boundaries until such a time as the Site Allocations and Development Policies DPD is prepared despite the acute shortage of suitable urban sites in certain parts of the Borough; and,

iii The policy fails to identify the “reserve” location sites within its text and no plans are included within the Core Strategy.

1.5 Green Belt land should be allocated now for residential and employment development in order to meet the Council’s objectively assessed housing needs, boost the supply of housing and deliver economic growth.

1.6 This statement expands upon these representations in the light of the Inspector’s questions. Where relevant, the comments made are assessed against the tests of soundness established in the 2005 Act and those in the National Planning Policy Framework [the Framework].

2.0 **Policy Context**

2.1 The relevant planning policy context for this statement is provided by national planning policy contained in the National Planning Policy Framework [the Framework]. At the heart of the Framework [§14] is a presumption in favour of sustainable development which should be seen as a golden thread running through both plan making and decision taking.

2.2 Other relevant policy requirements of the Framework relevant to Matter 2 are provided at §47, §82 – §85, §154, §156-§160, §173 & §182.

3.0 **Planning Issues**

3.1 Taking account of the policy context outlined in this paper we respond to Green Belt Issues 5.1, 5.2, 5.3, 5.4, 5.5, 5.6, 5.7, 5.8, 5.9 & 5.10 of the Inspector’s EiP questions. Green Belt Site KGBS19 and KGBS20 East of Halewood are also discussed in this paper.

4.0 **Issue: Whether the selection of broad locations for development in the Green Belt is justified by the evidence and whether the mechanisms for release are clear and effective**

5.1 - Is the statement in policy CS 5 that “inappropriate development will not be permitted in the Green Belt” consistent with national policy (which includes the ‘very special circumstances’ test)?

4.1 Taylor Wimpey and Redrow consider that the statement is not wholly consistent with the ‘very special circumstances test’ and should be expanded to enable the positive and beneficial use of the Green Belt in accordance with the Framework [§81].

5.2 - Is the methodology used to select broad locations robust? Does its complexity over-elaborate the assessment process and make it difficult to identify the critical determinants? Does the methodology enable proper value judgements about the relative importance of individual criteria to be made?

- 4.2 Taylor Wimpey and Redrow support the methodology adopted by the Council with regards to the identification of locations.
- 4.3 Taylor Wimpey supports the identification and subdivision of the parcels in the Green Belt Study and the approach that was adopted with regards to Stage 2 (Assessment of parcels against the Green Belt purposes), Stage 3 (assessment of constraints and accessibility attributes), Stage 4 (assessment of Local Plan evidence, strength of Green Belt boundaries and division into areas, and assessment of capacity of the areas). The methodology and stages adopted does enable proper judgements to made in relation to each criteria assessed. Whilst it is overly complex and not as concise as it could be, the results are robust in demonstrating those sites which have the least impact on the Green Belt (East Halewood).

5.3 - There is significant (and not always consistent) repetition amongst the treatment of individual criteria within the commentaries of the KLPCS Green Belt Location Appraisal Sheets (appendix 6 of Green Belt Technical Report (TR03)) – are the results of this process always as robust and clear cut as suggested?

- 4.4 Taylor Wimpey and Redrow consider that there is a degree of overlap between some of the purposes in the Green Belt so it is inevitable that there will be a degree of overlap. It is acknowledged that whilst there is repetition within the assessment of sites against the Green Belt purposes it is considered that the assessment undertaken in relation to the East Halewood Site is robust.

5.4 - Does the methodology ensure that an appropriate balance is achieved between Green Belt policy and the overall spatial strategy of the KLPCS? How has the relative priority between release of Green Belt land and development in areas at risk of flooding been determined, and has an appropriate balance been achieved?

- 4.5 Taylor Wimpey and Redrow agree that an appropriate balance between Green Belt policy and the overall spatial strategy has been struck. The development of regeneration sites, other urban sites and Green Belt release will facilitate the delivery of a mix and choice of houses in different locations to meet the needs of the community. The Council cannot wholly rely upon the development of regeneration sites to meets it housing needs. However, we would like to reiterate our concerns should sites within the urban area fail to deliver and in light of the issues we have raised in the Matter 2 Paper with regards to the delivery of housing sites. Green Belt housing allocations are needed now to meet the needs of the Borough regardless of whether the Council fails to

deliver the 6288 dwellings identified in the urban area. A balance needs to be struck to deliver housing on Green Belt land now and meet regeneration needs. The regeneration needs of the Borough should not prevent the delivery of housing on sustainable Green Belt land such as East Halewood.

- 4.6 Taylor Wimpey and Redrow consider that a robust position has been reached with regards to the release of Green Belt land and areas of flooding. It is acknowledged that a very small part of the eastern parcel of the East Halewood (North) site is situated on land subject to flooding. However, the proposed development can be designed to avoid the areas subject to flooding.

5.5 - Many Green Belt sites involve loss of best and most versatile (bmv) agricultural land. In the assessment has sufficient account been taken of the distinction between the different grades of bmv land?

- 4.7 The majority of the land on the urban fringe of Knowsley comprises best and most versatile agricultural land with the exception of some small pockets of land.

- 4.8 A desk survey of the Agricultural Land Classification of land around Halewood and the East Halewood Site has been undertaken. All of the land on the edge of Halewood comprises best and most versatile agricultural land. The need to deliver housing in more sustainable locations outweighs the need to retain the land for agricultural purposes.

- 4.9 There is therefore a need to accommodate the Borough's future development needs on best and most versatile agricultural land borough wide. With regards to Halewood failure to allocate sufficient land would prevent it from maintaining its population and role in the settlement hierarchy. Furthermore the need to deliver housing in more sustainable locations outweighs the need to retain the site for agricultural land purposes.

5.6 - Policy CS 5 refers to specific "broad locations" being removed from the Green Belt, but also says that boundaries will be defined at Site Allocations stage. As detailed boundaries for the broad locations are mostly identified in the evidence base, why are they not delineated and released at KLPCS stage?

- 4.10 Taylor Wimpey and Redrow Homes consider that it is entirely appropriate to allocate the reserve locations in the KLPCS now as there is a need to develop Green Belt sites and meet their housing requirement until 2028. The allocation of the East Halewood Site would provide certainty now and detailed boundaries have been assessed through the Green Belt Study by the Council and by Taylor Wimpey's consultants.

5.7 - How will the phased release of Green Belt sites operate in practice? Is the main driver of release the maintenance of a 5 year land supply (clause 3c of policy CS 5), or will urban regeneration objectives (clause 3b of policy CS 5) also have a role and if so, what will this be? Is it necessary to include the reference to meeting longer term development needs?

- 4.11 Taylor Wimpey and Redrow consider that Green Belt Sites such as East Halewood should be allocated now for development in the Plan. .
- 4.12 Taylor Wimpey and Redrow consider that no alternative strategies are available should development not come forward as envisaged. There is no flexibility or contingency if the sites in the urban area do not come forward as planned.
- 4.13 Policy CS5 is considered to not be an effective policy because:
- 1 3a is not a test for the release of land as it merely states that first priority shall be given to the development of land in the urban area.
 - 2 3b with regards to the timings of release must not undermine the Council's urban regeneration objectives including the delivery of programmes of regeneration is also not a test for the release of reserve locations. It is not clear how this can be delivered in reality. It is not clear how a development will meet requirements in terms of harm to the regeneration areas.
 - 3 3c does not provide sufficient clarity on the five year housing land supply position. There needs to be an appropriate release mechanism and monitoring of the 5 year housing land supply position and it should be provided by the Council through their annual monitoring reports. The policy as presently drafted does not provide a positive mechanism for boosting the supply of housing in accordance with the Framework [§47].
- 4.14 In addition, sites such as East Halewood should not be prevented from early delivery due to regeneration objectives because:
- 1 There are limited deliverable housing sites within the urban area.
 - 2 It is not in close proximity to any regeneration sites where residential development is proposed. It therefore would not affect the Council's regeneration priorities.
 - 3 Halewood is a key location in relation to major employers in the region such as Jaguar Land Rover (South Halewood), Liverpool John Lennon Airport and the Airport Business Park the need to bring forward the Halewood sites is greater. East Halewood is well related to the existing urban area and its development, as proposed, will contribute positively to the identified housing need.
- 4.15 Overall, Taylor Wimpey and Redrow consider that the only solution to maintain the Council's regeneration priorities and deliver housing over the plan period is to release Green Belt land now and allocate it for residential purposes..

4.16 The Council needs to strike a balance between delivering Green Belt sites now to meet their acute housing needs as well as balancing the issues of regeneration. The delivery and phasing of regeneration sites that are unviable should not stall the need to boost the supply of housing and promote economic growth in areas such as Halewood. Taylor Wimpey and Redrow consider that the main driver is the maintenance of a deliverable supply of housing land and this should take precedent in the policy over regeneration.

4.17 Taylor Wimpey and Redrow consider that it is appropriate to reference longer term development needs. The Council should satisfy themselves that Green Belt boundaries will not need to be altered at the end of the plan period. In order to ensure protection of Green Belts within this longer timescale, this will in some cases mean safeguarding land between the urban area and the Green Belt which may be required to meet longer-term development needs.

5.8 - Is there sufficient clarity in the KLPCS over the mechanism for the release of individual Green Belt sites – how will the relative order of release be determined? Why are the individual broad locations not identified in policy CS 5?

4.18 See above. Policy CS 5 is not effective.

4.19 Taylor Wimpey and Redrow consider that the sites identified in the reasoned justification (this includes East Halewood) should be formally identified in the policy and identified to deliver housing now.

5.9 - Is the approach to safeguarded land in policy CS 5, which does not rule out development before 2028, consistent with national policy which requires safeguarded land to be released through the Local Plan process?

4.20 See response to 5.7.

5.10 - KLPCS table 5.2 indicates that the potential supply/capacity of the broad locations proposed for Green Belt release substantially exceeds the potential shortfall to 2028. Given the importance of retaining as much Green Belt land as possible, is this potential over-allocation justified?

4.21 Taylor Wimpey and Redrow agree that the proposed Green Belt Sites for release should be in excess of the supply and this is wholly justified. Green Belt boundaries to be amended through the plan should look beyond the plan period.

5.0 Individual Green Belt Sites KGBS19 and KGBS20 East of Halewood

5.1 Taylor Wimpey and Redrow Homes support the recognition in Policy CS5, that Green Belt land is required to meet the housing requirements for the Borough and the identification of 'reserve locations' including East Halewood. As we have set out previously, East Halewood should be allocated for residential

development now. The release of the site will help deliver a comprehensively planned urban extension to this part of Halewood and it will maximise the amount of development that can be delivered on the site as identified by the Council.

- 5.2 As set out in the Statements on Matters 2 and 3, it is considered that a higher amount of housing should be provided to meet the requirements of the Borough for the period 2010-2028, than is currently identified in the emerging KLPCS. The release of Green Belt land will be required over the plan period if this identified requirement is to be met.
- 5.3 The Council's own evidence also shows that there is not sufficient land in the urban area and outwith the Green Belt to meet the dwelling requirement for the plan period identified in the emerging KLPCS. As a result, there is a clear need for the release of Green Belt land to meet this requirement.
- 5.4 The allocation of the site is justified and deliverable, and there are no constraints which would prevent its development for residential use. The site has been selected on the basis of robust evidence on all environmental and other impacts. The site:
- 1 Will meet an identified need for housing land within the Borough;
 - 2 Is the most sustainable Green Belt site on the edge of Halewood.
 - 3 Is not subject to any highways constraints that would prevent its development. Robust assessment work has been undertaken by Highways consultants acting for Taylor Wimpey and Redrow Homes which confirm that the delivery of 1,200 – 1,300 dwellings would be acceptable in the context of the Framework [§32].
 - 4 Would not be contrary to the purposes of including land in the Green Belt and there are exceptional circumstances to justify its release.
 - 5 Would involve the use of high quality agricultural land. However, the need to deliver housing in more sustainable locations outweighs the need to retain the site for agricultural land purposes.
 - 6 Is not subject to any landscape constraints which would prevent its development.
 - 7 Is not subject to any ecological constraints which would prevent its development.
- 5.5 These issues are dealt with in further detail in the Development Statement attached at Appendix 1 of this Statement. Technical assessment work has been undertaken by Taylor Wimpey and Redrow's consultants in confirming the technical suitability and deliverability of the development proposals.

Traffic Impacts

- 5.6 A separate Statement dealing with traffic impacts associated with the site has been submitted by Curtins. This Traffic Impact Statement is attached at Appendix 2 of this Statement.
- 5.7 This statement concludes that the impact of the potential residential development at Halewood would be acceptable in the context of the Framework [§32]. It is acknowledged that at certain key locations that minor off site mitigation works may be required as a result of traffic generated by the potential residential development.

Flood Risk

- 5.8 The Environment Agency has confirmed that the southern parcel is located within Flood Zone 1 (low risk). The land is designated as having less than a 0.1% annual probability of flooding from rivers or the sea in any year. The eastern part of the northern parcel is constrained by flood risk being located in Flood Zone 3. However, no residential development will be provided on these parts of the development parcel.
- 5.9 The allocation of the site is therefore sequentially preferable in flood risk terms. All uses of land, including housing are appropriate. The future development of the site will be planned to avoid increased vulnerability to the range of impacts arising from climate change.

Green Belt

- 5.10 The allocation of the site for residential development in the KLPCS has been informed by a Green Belt Study, Green Belt Technical Report and Sustainability Appraisal undertaken by the Council.
- 5.11 An assessment of the impacts of the site against the purposes of including land in the Green Belt and the exceptional circumstances to justify the release of the site from the Green Belt has been undertaken by Nathaniel Lichfield & Partners and Randall Thorp. This assessment is set out in the Development Statement for the site is attached to this Statement at Appendix 1.
- 5.12 Taylor Wimpey and Redrow concur with the Council that East Halewood (northern and southern parcels) no longer fulfil the purposes of including land within the Green Belt. The Knowsley and Sefton Green Belt Study concludes that land East of Halewood (north) has capacity to deliver 236 dwellings [KGBS 19] and land East of Halewood (south) has capacity to deliver 888 dwellings [KGBS 20]. Taylor Wimpey and Redrow Homes have undertaken detailed master planning work on the site which confirms that the land is capable of accommodating in the region of 1,200 – 1,300 dwellings on the site as well as meeting open space requirements, amenity and providing a strong long term defensible boundary to Halewood.

5.13 The release of Green Belt land to allow for the development of the East Halewood site is therefore considered to be justified.

Ecology

5.14 A Phase I Habitat survey and desktop survey were undertaken on the site in August 2013 by TEP. There are no statutorily-protected sites (SSSI, SPA, Ramsar, SAC) within the site or within 500m of the site. There are seven non-statutorily-protected sites (SBIs) within 1000m of the site.

5.15 Desktop searches revealed no records for protected species within the site.

5.16 There are records of water vole, great crested newt and bats from within 2km of the site. There is a single pond within the site boundary and two ponds located just outside the site area. The ponds assessed were classed as having poor suitability for great crested newt and no Great Crested Newts were found.

5.17 There are no ecological constraints preventing the development of the site and any appropriate mitigation will be provided where necessary.

Conclusions

5.18 The allocation of the East Halewood Site is justified and deliverable. There are no flooding, drainage, traffic, Green Belt, agricultural, or ecological constraints that would prevent its development. It should be released from the Green Belt and allocated for development now.

Appendix 1: Development Statement