

**KNOWSLEY CORE STRATEGY**

**MATTER 5: GREEN BELT**

**STATEMENT BY BARTON WILLMORE**  
**ON BEHALF OF JUNCTION PROPERTY LTD (JPL)**

**OCTOBER 2013**

**Issue: Selection and Release of Broad Locations**

**1. Question 5.1: Inappropriate Development**

1.1 In line with the NPPF JPL considers that Policy CS5 should allow inappropriate development where very special circumstances can be shown. To do otherwise would produce a potential conflict with national policy.

**2. Question 5.2: Green Belt Study: Methodology**

2.1 JPL considers that the methodology used by the Green Belt Study (GBS) (EB08) is unduly complex and over elaborate. After saying this, the methodology does take into account the key considerations which should determine the suitability of sites for exclusion, including impact on Green Belt purposes, sustainability and developability. As such the GBS can be considered reasonably robust (although inevitably we have differences on judgements for particular sites).

**3. Question 5.3: The GBS Location Appraisal Sheets.**

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

**4. Question 5.4: Relationship with the Overall Spatial Strategy.**

4.1 JPL considers that the GBS achieves an appropriate balance between Green Belt policy and the overall spatial strategy. In particular nearly all the proposed Green Belt releases are situated adjacent to the main settlements of Huyton/Stockbridge Village, Kirkby, Prescott/Whiston and Halewood, as defined by Policy CS1. JPL's only issue in terms of the spatial strategy is about the release proposed for Knowsley Village.

**5. Question 5.5: Best and Most Versatile Agricultural Land**

5.1 Best and most versatile agricultural land (BMV) is widely distributed in Knowsley (and most of the rest of Merseyside). It would be difficult to identify sufficient land for exclusion from the Green Belt which meets other sustainability criteria if BMV land is

excluded. As such JPL agrees with the GBS that BMV agricultural land should be treated as an important constraint but not an overriding one. This treatment is consistent with NPPF paragraph 112 which says that the economic and other benefits of BMV agricultural land "*should be taken into account*", but there is no suggestion that it is necessarily a showstopper if other factors outweigh it.

## 6. Question 5.6: Broad Locations or Strategic Sites

6.1 JPL suggested in its representations that the larger Broad Locations should be identified as strategic sites. The justification for this is:-

1. The boundaries of the sites have already been established by the GBS. The Allocations DPD will add little value to the planning process. Any details such as internal phasing or layout would be better dealt with by a development brief which could be prepared as a SPD.
2. There is an urgent need to increase the supply of market attractive housing and employment land (see matters 3 and 4 statements).

6.2 The Council has given no cogent reasons why the larger allocations have not been identified as strategic sites.

6.3 JPL's particular interest is in the two large sites proposed for exclusion from the Green Belt north and south of Junction 6 (South of Whiston and Cronton Colliery). The designation of both sites as strategic site allocations is justified because:-

- The sites are critical to the delivery of the spatial strategy for the Borough. The land north of the motorway (South of Whiston) would contribute nearly a quarter of the total housing provision required by Policy CS3. The land south of the motorway (Cronton Colliery and associated land) would be the largest employment site in the Borough, and is essential to attracting key employment target sectors such as knowledge based industries, advanced manufacturing and logistics.
- The development of the two sites is essential if the Core Strategy Spatial Vision is to be achieved in the plan period, especially those parts of the Vision relating to a stronger and more diverse economy "*which will help drive economic growth in the wider Liverpool City Region*", and to meeting needs and providing "*a wide choice of housing*."
- Due to their size, location and quality, the sites have the potential to have a transformative impact on the housing and employment offer of Knowsley. (See Question 5.22).
- Because of their scale and the amount of infrastructure required for their development, the two sites will have significant lead-in times and very long construction periods. In particular, the development of the housing site to the north of the motorway (with its capacity of over 1600 dwellings), will take at least 15 years to develop out. If development is not allowed early in the plan period, the two sites would not be able to make their full contribution to

meeting housing and employment needs in the plan period. In such circumstances, other 'Green Belt' sites would need to be brought forward to compensate.

- These proposals are viable and achievable in the plan period. Substantial interest has been expressed in the development of the two sites by volume housebuilders and commercial developers.
- There are no issues over the potential boundaries of the two proposed sites which are defined by public roads and the existing built-up area. As such, further consideration in the Allocations DPD would add very little value to the process.

## **7. Question 7: The Phasing Mechanism**

7.1 Policy CS6 is unclear on how any phasing mechanism would work. In particular, it does not specify whether the Green Belt sites would be released in one batch or whether some form of selection would take place between sites. If some selection is being suggested Policy CS6 provides no criteria for this selection other than a negative one of not undermining the Council's urban regeneration objectives.

7.2 Policy CS6 refers to the sites being released for "*longer term development*." However, the housing trajectory on Page 44 shows that Green Belt sites will need to start producing significant numbers of house completions by 2018/19. This means that these sites would have to form part of the identified five year supply once the base year reaches April 2014. To form part of the deliverable supply, the sites would have to comply with the NPPF criteria of being "*available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable*" (footnote 11). These criteria would not be met if the sites are the subject of phasing policies that prevent immediate development. For these reasons, the reference in Policy CS6 to "*longer term development*" and "*reserve locations*" is unhelpful and misleading.

7.3 JPL considers that the planning mechanism set out in Policy CS5 is unworkable and should be removed.

## **8. Question 5.8: Mechanism for the Release of Sites**

8.1 See answer to Question 5.7.

## **9. Question 5.9: Safeguarded Land**

9.1 JPL accepts that in accord with national policy, safeguarded land should not be released in advance of a Local Plan review.

10. **Question 5.10: Capacity of Potential Releases**

10.1 CS Table 5.2 does indicate that the total capacity of the sites being proposed for exclusion from the Green Belt exceeds the requirement in the plan period. However, JPL considers that this is acceptable for the following reasons:-

1. The NPPF (85) makes clear that when defining boundaries, local planning authorities should "*satisfy themselves that Green Belt boundaries will not need to be altered at the end of the plan period.*" In the case of Knowsley, this will inevitably mean that some land will have to be excluded to meet needs arising after the end of the plan period. National policy would not be satisfied if the CS simply excluded sufficient land just to meet needs arising up to 2028.
2. Table 5.2 overestimates the existing capacity outside the Green Belt by a substantial margin.
3. There are qualitative needs for housing and employment that can only be met by the release of 'Green Belt' sites (see our Matter 3 and 4 statements).

11. **Question 5.11: Major Developed Sites**

11.1 Policy CS6 is not consistent with national policy in its reference to major developed sites. The NPPF (89) now refers only to the "*limited infilling or the partial or complete redevelopment of previously developed sites*" as potentially appropriate development. Policy CS6 should be consistent with this.

12. **Question 5.12: Gypsies**

12.1 No comments.

**Individual Green Belt Sites**

13. **Question 5.22:KGBS14: South of Whiston\_**

13.1 The site South of Whiston extends to some 110ha and has the capacity for around 1600 dwellings. Barton Willmore has undertaken a preliminary master planning exercise on behalf of JPL which is attached to our representations. This master plan has been discussed with the Council and generally welcomed. Due to the site's site, size and environmental attributes, we consider the proposal has the potential to help transform the housing offer of Knowsley. In particular it can provide substantial numbers of executive/aspirational dwellings as well as affordable and mid-market homes. The location of the site together with the housing product it will offer means that it will not compete directly with the identified regeneration areas.

13.2 The site has strong and defensible outer boundaries including the M62 motorway and Fox's Bank Lane which are easily recognisable and permanent features in the landscape. As such the requirements of NPPF (85 last bullet point) are satisfied. There would be no harm to essential Green Belt purposes.

- 13.3 The site is highly accessible by non-car modes of transport. It is within walking and cycling distance of a train station and public transport interchange to the north on Pennywood Drive. There are also local shops, bus services and community facilities within the adjacent existing built-up area. The services and facilities of the area would be enhanced as part of the development.
- 13.4 There are no significant physical or environmental constraints on the development of this site.
- 13.5 The site comprises a mix of Grades 2,3a and 3b agricultural land. The site also contains four local nature conservation designations (Sites of Biological Interest). These designations are mostly woodland and are excluded from the area proposed for development by the masterplan. It is the intention that these locally designated areas would be linked by corridors of landscaping and open space, and would be actively managed to increase their ecological value.
- 13.6 Virtually all the site is Flood Zone 1 according to the Environment Agency flood maps.
- 13.7 It is very important that this site is planned and developed comprehensively rather than being a series of piecemeal developments. In particular:-
- The new facilities required to serve this strategic-scale development need to be planned so that they are in the best locations to serve the whole scheme. This would not happen if the site is developed in an ad hoc way. A development of some 1600 dwellings would generate a need for a new neighbourhood shopping centre, at least one new primary school, and potentially other community facilities.
  - A sustainable transport network needs to be provided comprehensively for the whole of the development. This includes not only access roads but also pedestrian and cycle links to facilities within and beyond the development including the public transport interchange and railway station to the immediate north.
  - A comprehensive network of linked green spaces need be provided. In particular the scheme needs to integrate the existing woodlands and lakes in the centre of the site within a comprehensive scheme so that they are enhanced for the benefit of the wider community.
  - A comprehensive urban design strategy is justified for the whole area. This would have major benefits in lifting the environmental quality of the development and avoid the appearance of a series of piecemeal speculative housing schemes.
  - Physical and social infrastructure should be planned for and provided comprehensively over the full extent of the site, including roads, foul drainage and SUDS. Any alternative to this would be very inefficient and possibly frustrate the full development of the site.

- The critical mass of the total development is much more likely to support high levels of public transport and low carbon technologies than if each part is planned as separate entities without regard to each other.

13.8 Government policy supports the provision of large strategic sites such as South of Whiston because of the benefits it can offer, for example NPPF (52) and the Ministerial Announcement on Housing and Growth. Equally, the RTPI policy paper on Delivering Large Scale Housing makes clear the importance of large sites saying (page 7):-

*"While there is no single solution, large scale housing-led developments could provide an important part of the response, as a large number of houses can be built whilst giving an opportunity for planners to design communities that people want to live in – with appropriate infrastructure, community services and green spaces."*

13.9 JPL agrees that internal phasing of the site will be necessary and this is shown by the master plan. However, there is no reason why such phasing should be a matter for the CS. In line with good practice, JPL intends (with the cooperation of other developers and landowners) that a single outline permission would be made for the whole site and that phasing would be dealt with by condition and/or obligation.

#### 14. **Question 5.24: KGBS17: Cronton Colliery.**

14.1 The early release of the Cronton Colliery site for economic development is essential if the qualitative deficiencies in the Borough's existing land supply are to be remedied, in particular for the key growth sectors of logistics, warehousing and advanced technology firms. The site is the only large employment proposal located along the strategically important M62 Corridor which is the main focus for economic development in the North West Region. It has visual prominence from the motorway and easy access to it via the recently upgraded Junction 6. It is also at the intersection with the M57 and close to Liverpool John Lennon Airport. The site is capable of attracting inward investment to the Borough on a scale and of a type which no other site in the Council's portfolio is capable of doing. It has proved in the past to be attractive to the market. A planning application in 2004 for a large warehousing and administrative complex for Matalan was only withdrawn after concerns were expressed about its Green Belt designation. JPL is currently working with a commercial property developer (Property Alliance Group) on bringing forward the site.

14.2 The site has strong and defensible outer boundaries including the M62 motorway, Fox's Bank Lane and Cronton Road which are easily recognisable and permanent features in the landscape. As such the requirements of NPPF (85 last bullet point) are satisfied. There would be no harm to essential Green Belt purposes.

14.3 The Barton Willmore master plan shows the proposals for the site which is in the control of JPL, Maro Developments, and the Land Trust (who owns the former colliery). The master plan shows the colliery being reclaimed for a country park whilst the adjoining land would be laid out as a high amenity employment and logistics park. The employment and the country park would be complementary to each other as the emphasis of the employment park would be to create a high standard of environment for its occupiers so that it provides a very different offer from the existing employment land in Knowsley.

- 14.4 Small parts of the site are within Flood Zones 2 and 3, predominantly within the area of the proposed country park. No built development is proposed within Flood Zone 3 whilst a sequential test would be applied to any proposals within Flood Zone 2.
- 14.5 There would be substantial benefits if the land north and south of the motorway is treated comprehensively. The two sites together make up a proposal which is capable of transformative impacts upon the housing and employment offer of the Borough due its scale; its location at a key gateway into the Borough (Junction 6); and the standard of environment it can create. Also, a comprehensive approach would allow joint sustainable transport initiatives to be developed, including bus, foot and cycle links over the M62 motorway. This would greatly improve the accessibility of the employment site to the urban areas of Huyton and Prescott/Whiston. The potential of these links is shown on the Barton Willmore master plan. Finally, the scale of the joint development would allow innovative low carbon technologies to be employed including potentially Combined Heat and Power using methane gas from the old mine workings. Further studies need to be carried out but it is the scale of the joint development which makes these options possible and potentially viable.
- 14.6 National policy favours the development of large mixed developments of this type(NPPF paragraphs 17 and 38).
- 14.7 In conclusion, the Cronton Colliery proposal is a key part of the spatial strategy and is essential if qualitative and quantitative deficiencies in the Council's current employment land supply are to be remedied.