PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

REPORT ON THE EXAMINATION INTO

KNOWSLEY LOCAL PLAN: CORE STRATEGY

Document submitted for examination on 19 July 2013
Examination hearings held between 5 November 2013 and 4 June 2015

File Ref: PINS/V4305/429/1
Abbreviations Used in this Report

AA  Appropriate Assessment
ALC  Agricultural Land Classification
BREEAM  Building Research Establishment Environmental Assessment Methodology
DCLG  Department for Communities and Local Government
dpa  dwellings per annum
dph  dwellings per hectare
EVA  Economic Viability Assessment
Framework  National Planning Policy Framework
ha  hectares
IDP  Infrastructure Delivery Plan
JELPS  Joint Employment Land and Premises Study
KLPCS  Knowsley Local Plan: Core Strategy
LCR  Liverpool City Region
LDS  Local Development Scheme
MM  Main Modification
PPG  Planning Practice Guidance
PPTS  Planning Policy for Traveller Sites
PRA  Principal Regeneration Area
RSS  North West Plan: Regional Spatial Strategy to 2021
SA  Sustainability Appraisal
SADP  Site Allocations and Development Policies
SCI  Statement of Community Involvement
SHLAA  Strategic Housing Land Availability Assessment
SHMA  Strategic Housing Market Assessment
SPD  Supplementary Planning Document
SuDS  Sustainable Drainage System
SUE  Sustainable Urban Extension
UDP  Unitary Development Plan
Non-Technical Summary

This report concludes that the Knowsley Local Plan: Core Strategy provides an appropriate basis for the planning of the borough, providing a number of modifications are made to the plan. The Knowsley Metropolitan Borough Council has specifically requested me to recommend any modifications necessary to enable the plan to be adopted.

All of the modifications to address this were proposed by the Council but where necessary I have amended detailed wording and/or added consequential modifications and I have recommended their inclusion after considering the representations from other parties on these issues.

The Main Modifications can be summarised as follows:

- Changing the Council’s proposed Green Belt ‘reserve locations’ for development to ‘Sustainable Urban Extensions’ (SUEs) with specific policy requirements;
- Removing the phased release of Green Belt development to ensure sufficient land is available to meet short term needs;
- Clarifying and reducing slightly the employment land requirement;
- Modifying the approach to retail development in town centres to better reflect national policy;
- Reducing the affordable housing requirement within urban areas to help ensure development is viable;
- Updating the policies for housing standards and sustainable construction to reflect national policy; and
- Adjusting the approach to biodiversity, heritage assets, open space and minerals to be consistent with national policy.
Introduction

1. This report contains my assessment of the Knowsley Local Plan: Core Strategy (KLPCS – the Plan) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan’s preparation has complied with the duty to co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) makes clear that to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.

2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my examination is the KLPCS Submission Document of July 2013.

3. My report deals with the main modifications that are needed to make the Plan sound and legally compliant and they are identified in bold in the report (MM). In accordance with section 20(7C) of the 2004 Act, the Council requested that I should make any modifications needed to rectify matters that make the Plan unsound/not legally compliant and thus incapable of being adopted. These main modifications are set out in the Appendix.

4. The main modifications that are necessary for soundness all relate to matters that were discussed at the examination hearings. Following these discussions, the Council prepared a schedule of proposed modifications and carried out sustainability appraisal; this schedule has been subject to public consultation. A separate consultation was undertaken on a changed approach to wind energy development (see Issue 7). I have taken account of the consultation responses in coming to my conclusions in this report, and in this light I have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. None of these amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken. Where necessary I have highlighted these amendments in the report.

5. Many proposals of the KLPCS are repeated in different parts of the Plan (for example, strategic land allocations are repeated in the Area Priorities section). In most cases I have treated main modifications to repeat proposals as consequential and have not separately identified them as main modifications in the Appendix. In addition, the Council has proposed a large number of additional modifications which do not materially affect the policies of the Plan. These are solely a matter for the Council. In some instances, modifications identified by the Council as “main” I regard as “additional”, and vice versa. In this report and the Appendix I focus on what I regard as the main modifications necessary to make the Plan sound. Any of the Council’s main modifications which are not specifically mentioned in the report or Appendix are either consequential or additional, and can be made by the Council on adoption of the Plan.
Public Consultation

6. There was major disquiet throughout the examination at the nature and extent of the Council’s consultation with the public during preparation of the KLPCS. Two main issues emerged – whether the dissemination of information about the evolving plan was sufficiently thorough, and whether the content of the information supplied was easily understood by most people.

7. In terms of the former, the statutory requirement is that the Council complies with its own Statement of Community Involvement (SCI). The SCI requires consultation by a wide range of methods (at least 6-8 different methods at the main stages), so the framework for consultation is thorough. There is evidence of a wide range of authorities, organisations, agencies, partners, local groups and individuals being consulted by many different methods during KLPCS preparation. Thus at each stage the Council carried out (and mostly exceeded) the required methods of engagement set out in the SCI. Moreover, at two early stages (‘Issues and Options’ and ‘Preferred Options’), a leaflet was delivered to all households in Knowsley. A small number of addresses appear not to have received the leaflet at ‘Issues and Options’ stage, which is unfortunate, but the problem does not seem to have been widespread and, given the range of other methods used, does not amount to non-compliance with the SCI. The Council used a different carrier for the ‘Preferred Options’ leaflet delivery and no significant problems were reported.

8. Turning to the content of the information disseminated, the Council has been criticised for not making its proposals clear. The main concern relates to the release of Green Belt land for development, which at ‘Preferred Options’ stage was depicted by coloured ‘blobs’ on the key diagrams included in the 8-page leaflet distributed to all households. It is true that these diagrams require careful study to gain an understanding of the proposed developments, yet many people in the communities affected were able to understand the emerging Plan and make their objections known. With hindsight the Council could have used simpler visual representations which focused solely on the main proposals, with perhaps greater detail in the text to better describe the Green Belt locations (road names and so on). Nevertheless almost 2,400 individual comments were submitted at this stage (1,400 in petitions) from 389 respondents, a significant response which suggests that the information was adequate for its intended purpose.

9. The consultation on Proposed Modifications during the examination attracted a much greater level of objection primarily because the Council directly consulted all residents living within 200m of the proposed Green Belt sites; this was a consequence of the change in status of the sites from broad locations to specific allocations. It is unclear why major objections to the long term Green Belt site at Knowsley Village were only made at this stage. Whatever the reason, Knowsley village residents received the same information about the Plan at earlier stages as all other residents, so the lack of response can hardly be blamed on inadequate consultation. Moreover,

---

1 It was suggested at the hearings that there may have been a misunderstanding over the interpretation of the term "safeguarded land". The text of the leaflet at Preferred Options stage refers to "land at Knowsley Village (for housing, after 2027)" and the key diagram identifies the land as "locations safeguarded for urban extension (post 2027)". This seems clear and I would be surprised if it was widely interpreted as meaning "land which is safeguarded from development".

- 4 -
reconvening the hearings in June 2015 gave all representors who were previously unaware of the Plan’s proposals the opportunity to be heard.

10. I do not agree that direct mailings at Proposed Modifications stage should have extended beyond the 200m consultation zone – such coverage is extensive and far exceeds the requirements of the SCI. Nor is it realistic to expect Council officers to knock on local residents’ doors to explain the proposals, as some objectors demanded. A proportionate approach is required, which in my view the Council has adopted. Overall, the statutory test of compliance with the SCI has been met, as one of the local objector groups acknowledged, and the consultation requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012 have been exceeded.

Assessment of Duty to Co-operate

11. Section s20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A of the 2004 Act in relation to the Plan’s preparation. The duty requires local planning authorities to co-operate with other Councils and bodies to address strategic cross-boundary issues when preparing Local Plans.

12. There is evidence of significant co-operation on strategic planning matters between the six local authorities which comprise the Liverpool City Region (LCR). It is clear that this has involved more than mere consultation with, at times, meaningful dialogue taking place between authorities to resolve matters of mutual concern. Based on a range of joint evidence-base studies which underpin their respective Core Strategies, the LCR authorities have collaborated on matters including housing strategy, transport, economic development and minerals/waste planning. Given the close interrelationship between Knowsley and its neighbours in terms of housing markets and travel to work areas, there has been much discussion of issues such as the provision of housing and jobs and the approach to the Green Belt.

13. Three examples illustrate the nature of this engagement. Liverpool City Council initially expressed concern at the scale of Knowsley’s proposed release of Green Belt land for housing because of an identified surplus of housing land within the city. However, because this was weighted towards flatted schemes in and around Liverpool city centre, it was agreed that this potential supply would not meet Knowsley’s need for family dwellings. Secondly, the three authorities who face the most severe shortages of land have either undertaken a joint Green Belt study (Knowsley and Sefton) or a study to the same methodology (West Lancashire) to ensure a consistent approach to Green Belt releases. Thirdly, following concern expressed by West Lancashire Council, the scale of retail floorspace proposed for Kirkby town centre has been reduced to avoid conflict with Skelmersdale town centre.

14. None of the bodies with which the Council is required by S33A to co-operate objects to a lack of engagement with Knowsley or to the content of the KLPCS, and none of the objectors has provided compelling evidence that the duty has not been met. Accordingly the requirements of s20(5)(c) are satisfied.
Assessment of Soundness

MAIN ISSUES

15. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified nine main issues upon which the soundness of the Plan depends.

ISSUE 1 – WHETHER THE SPATIAL DEVELOPMENT STRATEGY AND DEVELOPMENT PRINCIPLES ARE SOUND HAVING REGARD TO THE CONTEXT AND NEEDS OF THE BOROUGH

16. Knowsley is a predominantly suburban borough which stretches around the eastern fringes of Liverpool city. When planning for future development of the borough, two significant problems are frequently encountered. Firstly, the borough has a poor image as reflected in historic population decline and significant deprivation. A major loss of nearly 40,000 people between 1971 and 1991 was stabilised during the 1990s by a substantial house building programme. There was a further loss of about 5,000 people between 2001 and 2011 as a result of large scale demolition of unsuitable housing stock, a housing constraint policy and the impact of the recent recession. Based on 2010 data, the borough is the fifth most deprived local authority in England, with high levels of worklessness, poor educational attainment, low levels of life expectancy and the lowest resident incomes on Merseyside.

17. The second problem is a lack of cohesion and identity as a functional and administrative entity because of Knowsley’s geography. It comprises four main settlements: Kirkby to the north-east of Liverpool, Huyton and Prescot/Whiston to the east and Halesowen to the south-east. Most settlements have better links with the adjacent parts of Liverpool than with the others in the borough, and the western edges of Huyton and Halewood are contiguous with residential neighbourhoods of the city. Many residents of these settlements are fiercely loyal to and protective of their own specific town, but bear little allegiance to the borough as a whole. This creates tensions which, at times, challenge a coherent approach to plan making across the borough.

18. In responding to these problems, the Plan seeks to strengthen the role of Knowsley’s suburban towns and their contribution to the Liverpool City Region. Among the key strategic objectives of the Plan are stemming out-migration by rebalancing Knowsley’s housing market, regenerating areas of social and economic deprivation, and encouraging economic growth which improves skills and promotes enterprise. The spatial development strategy (policy CS 1) aims to focus development within the urban areas, particularly at locations in or close to regeneration areas, by making efficient use of land and re-using previously-developed land. The Submission Plan indicated that in the longer term, when the supply of land within the urban areas is exhausted, urban extensions will be required to meet the remaining housing and employment needs of the borough. Because all land outside the existing urban areas is Green Belt, these extensions involve the release of land from the Green Belt.

19. This strategy is founded on an extensive evidence base and is broadly consistent with both the former North West Plan: Regional Spatial Strategy (RSS) and more recent studies for the Liverpool City Region. In principle it is
well-founded. The focus on regeneration areas addresses the parts of the borough in greatest need, while the existing urban areas have services and infrastructure in place and are the most sustainable locations for development. This part of the strategy is indisputably consistent with the National Planning Policy Framework (the Framework) and received widespread support.

20. The main point of contention is the release of Green Belt land to meet the unmet needs when the urban supply runs out, which attracted widespread objection from local people. Many argue that the scale of need for new housing should be lower than stated in the Plan and that there is much greater capacity within the urban area than has been identified. It is believed that these factors obviate the need for Green Belt land which, in any event, should be protected from development. On the other hand, representatives of the house-building industry argue that the urban land supply is not capable of meeting the short-term housing needs of the borough and that Green Belt releases are required much earlier in the Plan period.

21. A conclusion on the required scale of housing and employment development, the capacity of the urban areas to accommodate this development, whether the release of land from the Green Belt is justified and if so, its phasing, cannot be reached until the detailed arguments are addressed later in this report. The scale of the housing need and the capacity of the urban area is considered under issue 2, employment under issue 3 and the loss of Green Belt under issue 4.

22. Policy CS 2 establishes a set of overarching development principles which are intended to underpin all new development in Knowsley and to foster delivery of sustainable communities and healthy environments. The associated text indicates that these principles will apply to decisions relating to policy and investment, though the policy itself omits to include subsequent stages of Local Plan preparation (which will formulate policy). And although these principles are numerous and wide-ranging, one of the most important objectives of the KLPCS, which is to meet the needs for new housing, employment and retail provision, was not mentioned. The Council felt that this objective was satisfactorily covered by other strategic policies, which should be read together. This may be so, but because policy CS 2 establishes the guiding principles for most other policies of the Plan, meeting needs should be included. MM4 addresses these matters.

ISSUE 2 – WHETHER THE SCALE, BROAD LOCATION AND DELIVERY OF HOUSING IS SOUND HAVING REGARD TO LOCAL NEEDS AND CONSTRAINTS AND THE REQUIREMENTS OF NATIONAL POLICY

Scale of housing need

23. The Framework requires Local Plans to meet the full, objectively assessed needs for market and affordable housing in the relevant housing market area, and promotes preparation of a Strategic Housing Market Assessment (SHMA) to provide a clear understanding of those needs. The SHMA should identify a scale of housing need which meets household and population projections (taking account of migration and demographic change), address the need for all types of housing, and cater for housing demand and the scale of supply necessary to meet this demand.
24. The Knowsley SHMA was published in 2010 and is based in part on household survey data from 2007. It calculates the annual average demand for market housing to be 741 units and that for affordable housing to be 568 units (addressing the backlog over 10 years); over the 18-year plan period the average annual requirement is 1,048 dwellings. However, the SHMA comes with two important caveats. Firstly, the market housing demand is based on surveys of households over a three year period which may not be reflective of the longer period, and secondly the figure is only assumed to apply until 2012, when new primary data should be sought. The SHMA acknowledges that the 2006-based Department for Communities and Local Government (DCLG) household projections indicate a total increase of around 8,000 households over the period 2011 to 2029, averaging about 445 new households per annum.

25. After publication of the SHMA, the 2008-based DCLG projections were released. These forecast household growth of 6,480 over the plan period, an average of 360 new households per annum. More recently the 2011 Census results have become available. These provide the most accurate demographic data for the borough and an up-to-date benchmark for projections. The Census reveals that, contrary to the small increase in Knowsley’s population since 2001 that was predicted in the SHMA, there was a 3% decline over the decade. And while over the same period there was a small increase in the number of households as a result of falling household sizes, the number of households in 2011 was some 3,700 lower than predicted in the SHMA. This lower historic growth is reflected in recent projections based on 2011 Census data. Interim 2011-based DCLG projections suggest household growth of about 2,400 to 2021, averaging 240 pa; this increases slightly to 258 pa (about 4,600 over the plan period) using 2012-based DCLG projections published in February 2015.

26. A dozen other housing provision models were tested by the Council, based on factors such as historic build rates, urban land capacity, employment-based forecasts and technical work undertaken by 4NW in preparation for the Regional Spatial Strategy (RSS) update before formal regional planning was abolished. All have limitations, and none have previously been subject to testing at examination. The build rate runs (which incorporate gross completions of between 239 and 607 dwellings per annum (dpa)) vary considerably depending on the period chosen, though they demonstrate that a build rate of 500-600 dpa is potentially achievable. Although most of the 4NW forecasting model runs are based on later projections than those used in the SHMA, they tend to be more robust at regional rather than local level and they predate the significant demographic changes recorded in the 2011 Census.

27. In these circumstances, establishing the objectively assessed housing need is far from straightforward. A balance has to be found between the 2011 Census-based projections which reflect the economic downturn since 2007/8, and the SHMA results which are based on limited and outdated survey information and are dramatically higher than all other projections. In practice, narrower and more realistic limits for the assessment of housing need come from the work undertaken for 4NW, which have the merit of being consistent at sub-regional level; these model runs range between 413 and 582 dpa, with an average around 500 dpa. The Council’s approach is to rely on the adopted RSS figure of 450 dpa, the latest figure that has been found sound at
examination (8,100 over the plan period). This is slightly below most of the later model runs which predate the recession, though it is substantially above the 258 annual household increase derived from the DCLG 2012-based projections which, Planning Practice Guidance (PPG) advises, should be the starting point for assessment.

28. The arguments for a substantial uplift to the latest demographic projections are strong. Firstly, the low level of growth derived from the 2012-based forecast carries forward the trends of the past five years, which cover the height of the recession and a period of population loss in Knowsley. This would perpetuate the decline that has beset the borough over recent decades and would be contrary to the Plan’s stabilisation objective. The 2012-based Office for National Statistics population projections, on which the household projections are based, illustrate this point. They project a decline in the working age population of about 7,000 persons over the plan period, largely through out-migration as a result, in part, of a limited choice of housing. Although this would be offset by a larger increase in elderly population, the consequences for the local economy in terms of loss of spending power, slower growth of local businesses and extra pressure on health and other services would be significant.

29. Secondly there is a need, highlighted in the 4NW work, to address the housing backlog accrued during the constraint period of low growth in the mid 2000s, which (coupled with large scale demolitions) contributed to the population loss. In Knowsley the backlog between 2003/4 and 2009/10 (the KLPCS start date) was 1,867 dwellings, representing an annual increase of 104 dwellings over the plan period. A third factor is consistency with the emerging strategies of neighbouring authorities, which despite RSS revocation are proposing housing need figures which are broadly in line with the former regional strategy. This matter was examined in the Liverpool City Region Overview Study and, in general, was found to be an appropriate way forward.

30. Another consideration is the very high need for affordable housing which, even if delivered over the 18 year plan period rather than the 10 years indicated in the SHMA, would amount to 315 per annum. Despite an extensive programme of affordable housing provision from registered providers and the policy CS 15 requirement for all housing sites of 15 or more dwellings to deliver a proportion of affordable housing, there is no realistic prospect of the affordable housing need being met. PPG advises that an increase in total housing figures should be considered where it could help deliver the required number of affordable homes. This adds weight to the case for a figure that is substantially above the demographic baseline.

31. Some representors argue that the backlog should be added to the RSS figure of 450 dpa, giving a housing target over the plan period of 554 dpa. Such a figure would be broadly consistent with the higher forecasts that emerged from the 4NW work. But these forecasts are based on 2006 projections which are higher than those of previous (2004) and later (2008) years and represent circumstances which are appreciably different to the reduced number of

---

2 An interpolated figure based on 9,700 loss of working age population over the 2012-2037 period.
3 The backlog is important because it arose from an earlier (Regional Planning Guidance 13) housing constraint policy which reduced housing delivery (and thereby population growth) during 2005-2008; this constrained growth is reflected in the 2008- and 2011-based projections.
households recorded at the 2011 Census. There is greater force to the argument that the backlog should be added to the 2008-based projections, which reflect periods of growth and constraint and represent a mid-point between the optimistic 2006-based projections and the pessimistic 2011/2012-based projections. Adding the backlog (104 dpa) to the 2008-based projection (360 dpa) gives a total of 464 dpa over the plan period, which is roughly equivalent to the Council’s 450 dpa figure.

32. PPG advises that the housing need number suggested by household projections may need to be adjusted to reflect relevant market signals. There is no evidence that land prices have been influenced by a shortage of supply, and house prices have not departed from the long term trend of being appreciably below the regional average. Rental levels and affordability (the ratio of house prices to earnings) have not shown any significant recent change, with affordability being slightly below the regional figure. And overcrowding has actually reduced between 2001 and 2011, contrary to regional and national trends. These market signals do not indicate an undersupply of housing relative to demand – if anything, they reinforce the view that much of Knowsley is an area of low market demand for housing. Consequently they do not lend support to those arguing for a higher need. On the other hand, a lower figure would not be consistent with the KLPCS objectives of population stabilisation and rebalancing the housing market.

33. Overall the wide range of housing need forecasts, coupled with factors which pull in different directions, make it difficult to identify a robust dwelling figure. This is not an exact science and the 8,100 figure chosen by the Council is well within the range of reasonable forecasts. Indeed, the absence of compelling arguments in favour of an alternative figure means that there is no real justification for departing from the figure adopted by the Council.

**Broad location of housing provision – urban areas**

34. The 8,100 dwelling need figure is imported directly into the housing target sought by policy CS 3. It is expressed as a minimum net figure to reflect the losses that will occur from residential conversions, changes of use and demolitions. In its initial evidence to the examination the Council predicted that sites for 78% of this requirement (6,288 dwellings) would be found within the urban areas (including Unitary Development Plan (UDP) allocations). This appeared to be a relatively cautious estimate, for it included a discount of 20% to allow for sites that are not developed and made no allowance for new sites coming forward (windfalls); furthermore it was based on realistic site densities and net developable areas.

35. However, testing of the UDP allocations and the Strategic Housing Land Availability Assessment (SHLAA) sites against the criteria set out in the Framework raised questions about delivery of the urban supply. Three common themes emerged. Many sites appear not to be viable under the Council’s Economic Viability Assessment (EVA) when normal requirements relating to sustainable construction, infrastructure and design are applied; the situation worsens if affordable housing is also sought. A number of small,
publicly-owned sites are physically constrained and, being mostly in low demand areas, there is little prospect of them being delivered. And a sizeable proportion of the supply is planned to come from UDP allocations which, despite being available for many years, have not proved attractive to the market and remain undeveloped.

36. The Council responded with evidence of sites categorised as unviable which have been developed, sites where physical and other constraints have been overcome, and information which suggests that a significant proportion of the UDP supply is about to come forward. It also outlined its future programme of Council land disposals, which features packages of sites in both higher and lower value areas where it seeks to achieve wider objectives than maximising capital receipts for the authority. These are encouraging signs and though certain aspects (such as the huge spike in Council land disposals programmed for 2015/16) seem optimistic, it appears that housing delivery should pick up as the local economy recovers from the recession. Nonetheless, the application of a 20% discount to the identified land supply is a somewhat rudimentary approach that does not directly align with the evidence. A more tailored and robust estimate, obtained by applying a range of discounts to the identified supply, was developed during the hearings. This revised the urban supply figure for 2010-2028 down to 5,829 dwellings, representing 72% of the requirement coming from the urban areas.

37. Many local residents believe that there is scope for more houses to be built within the urban areas and a wide range of sites was suggested. Most are educational, community and recreational sites which are not currently surplus to requirements and therefore are not available. Other suggestions relate to businesses that have closed, but in most cases there is no indication that such sites would be promoted for housing. The relatively small additions made as a result of these suggestions are well within the normal variation that occurs to a land supply which, because it is a snapshot of availability at a point in time, is constantly changing. Indeed, the limited change that has occurred over the extended period of plan preparation lends weight to the Council’s view that the identification of potential urban housing sites through the SHLAA process has been rigorous. There is no evidence of a significant supply of urban land that has not been identified by the Council.

38. Some representors contend that the SHLAA sites will be built at higher densities than predicted by the Council, meaning that the yield from urban sites has been underestimated. The most accurate information on density comes from recent completions: based on data provided by the Council, I calculate the average density of sites built in the last two years to be 32dph, slightly above the 30dph assumed in the SHLAA. The difference is not significant and whilst it confirms the Council’s assertion that the SHLAA takes a cautious approach, it does not support the notion of substantially more dwellings being built within the urban area. Nevertheless, in some locations densities above 40dph may be acceptable; MM7 is necessary to correct the impression that 40dph represents an upper limit.

---

5 See documents EX23 and AD38.
6 Information from current applications, such as the proposal to increase capacity of the Prysmian Cables scheme at Prescot, is a less robust data source because it is not known whether the increase in density will be accepted by the Council. And even if it is accepted, site densities can change over the course of development.
39. As to the Government’s intention to create a fund to unlock brownfield sites for development, the details of this scheme are yet to emerge and as the Council already has an ambitious programme of brownfield land disposals, the effects of this initiative for Knowsley are uncertain. Overall there is no compelling evidence of significantly greater capacity for housing development on urban land over the plan period.

Broad location of housing provision – Green Belt

40. During plan preparation the Council explored a number of alternatives to Green Belt release such as developing urban greenspace, intensifying development within regeneration areas, and achieving higher urban densities more generally. As indicated above, the study of potential urban housing sites in the SHLAA was thorough and tended to overestimate rather than underestimate the amount of urban land that is deliverable over the plan period.

41. The Council also considered whether some of its housing need could be met in neighbouring districts. The Liverpool City Region study identified significant land shortages in Sefton and Knowsley by 2031 and smaller shortfalls in St Helens and West Lancashire. Liverpool,Wirral and Halton were identified as having some spare capacity, but this mostly comprises apartment schemes in Wirral and Liverpool city centre. These developments would not provide the mix of housing (mainly family dwellings) required in Knowsley. Moreover, provision outside the borough would fail to address a fundamental objective of the KLPCS, which is to create a more balanced housing market in Knowsley that will better contribute to sustainable communities. Thus there is no compelling evidence that utilising the limited capacity outside the borough would be an appropriate or desirable means of meeting Knowsley’s needs.

42. In the absence of feasible alternatives, the Council decided that releasing some Green Belt land beyond the existing settlements is unavoidable if the key objectives of the Plan are to be met. The Submission KLPCS identified nine Green Belt areas as “reserve” locations for development and one as a “safeguarded” location for the longer term, beyond the plan period. Submission policy CS 5 set out a phased approach to release of the reserve locations, giving first priority to development within the urban areas and stating that permission for both housing and employment development will only be given when necessary to maintain a five year supply of land. The policy indicated that the boundaries of the broad locations would be defined in the Site Allocations and Development Policies Plan (SADP).

43. Many local residents object to the principle of developing Green Belt land to meet housing needs. They cite the overarching presumption in favour of sustainable development at paragraph 14 of the Framework, which requires local plans to meet objectively assessed needs unless Green Belt and certain other policies indicate that development should be restricted. On this basis they submit that the Framework opposes any loss of Green Belt land. It is argued that because the Knowsley part of the Merseyside Green Belt is very narrow and highly vulnerable, its erosion would be contrary to the objectives and purposes of Green Belt designation.

44. The restriction on development in the Green Belt at paragraph 14 of the
Framework means that it is not sufficient to apply the usual ‘planning balance’ between meeting objectively assessed needs (as sought by paragraph 47) and the adverse effects of doing so. Paragraph 79 stresses the great importance attached by Government to Green Belts as a means of preventing urban sprawl by keeping land permanently open. However, paragraph 83 does allow Green Belt boundaries to be altered “in exceptional circumstances” as part of the preparation or review of a local plan. The focus is on promoting sustainable patterns of development: paragraph 84 requires consideration of the consequences of channelling development towards non-Green Belt locations, while paragraph 85 seeks (amongst other matters) consistency with the strategy for meeting identified requirements for sustainable development.

45. Objectors also argue that the Ministerial statements, PPG revisions and associated press release in October 2014 signal greater protection for the Green Belt and necessitate a reassessment of the KLPCS. The revised PPG stresses the importance that Government attaches to protecting the Green Belt. It states that the Framework should be read as a whole: need alone is not the only factor to be considered when drawing up a local plan. It indicates that, when considering how to meet the identified need, constraints such as Green Belt may restrain the ability of an authority to meet its housing need.

46. Whilst the revised PPG stresses the great importance of protecting the Green Belt, by using the word “may” it does not direct planning authorities to a particular outcome. As indicated above, sustainability is at the forefront of the Council’s approach and it has determined that Green Belt releases are a necessary component of the sustainable development of its area, as set out in policy CS1 “Spatial Strategy for Knowsley”. Alternative strategies have been tested and found to be less sustainable. During the examination the Council reflected on the recent PPG changes and decided that its strategy for reversing population decline and regenerating Knowsley’s communities remains sound. There is no compelling evidence that this strategy is unsound. Thus in principle the exceptional circumstances test of the Framework is satisfied. The detailed policies for SUEs and the choice of sites are addressed under issue 4.

**Phasing and five year housing land supply**

47. PPG states that local planning authorities should have an identified five-year housing supply at all points during the plan period. At KLPCS submission the Council believed that the urban land supply would meet this requirement in the early years, allowing brownfield sites to be built before facing competition from the more attractive and easier to develop greenfield sites. Consequently the Submission Plan indicated that the Green Belt reserve locations would not be needed until later in the plan period (around 2022).

48. In principle this is a laudable strategy which accords with the Framework’s promotion of the effective use of land. However, the testing of SHLAA sites and UDP allocations led to some urban sites identified in the first five year tranche being rejected and others being put back to years 6-10. Consequently it became apparent that the Green Belt sites would be needed earlier if the Council is to provide the five year supply of deliverable sites (plus 20% buffer

---

7 “....take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.” (PPG: Housing and economic land availability assessment, paragraph 045 - my emphasis).
for past under-delivery) that is required by the Framework. Following additional work during an adjournment of the examination, the Council decided to re-designate the Green Belt reserve locations as Sustainable Urban Extensions (SUEs) and to allocate them all for immediate release on adoption of the Plan. Other options were considered, but there was felt to be no clear rationale to justify a phased release of sites. This also enables the authority to demonstrate a five year supply (plus buffer) of housing land. MM1 and MM2 make the necessary changes to policy CS 1 and supporting text, MM5, MM8 and MM11 address policies CS 3, CS 4 and CS 5, and MM22 is the new SUE chapter.

49. The initial five year land supply calculation did not include the shortfall that has accrued in the first three years of the plan period, which amounts to 743 dwellings. PPG advises that such a shortfall should, where possible, be dealt with within the first five years of the plan period. If this is added in, there is a sizeable supply deficit in the five year period from 2013/14, though from 2014/15 onwards the deficit is eliminated. This reinforces the point that the immediate release of Green Belt sites is necessary if the Council is to demonstrate a five year land supply (including shortfall and buffer) at the time the Plan is adopted. MM5 makes clear that any shortfall should be included in the five year land supply, though the precise method of calculation is not stated. The Council has demonstrated that a five year supply exists from 2014/15 if the 20% buffer is applied after the shortfall has been added. The modified housing delivery is shown on a revised housing trajectory at MM6.

50. The Council’s original proposal to phase the release of certain Green Belt sites was predicated on not threatening the regeneration objective of the Plan by minimising competition with schemes in nearby Principal Regeneration Areas (PRAs). But this concern was not borne out by evidence (albeit cursory) which indicates that the impact on this objective would be beneficial. In any event, the impact of SUE policies is likely to be limited because, of the three sites most likely to compete with PRA schemes, the Bank Lane, Kirkby site has already been granted permission by the Council, the residential capacity of Knowsley Lane, Huyton has been reduced because most of the land is required for employment use, and Carr Lane, Prescot is a relatively small site.

Safeguarded land

51. The Framework states that when Green Belt boundaries are reviewed, local planning authorities should have regard to their intended permanence in the long term. Paragraph 85 indicates that where necessary, areas of ‘safeguarded land’ should be identified between the urban area and the Green Belt in order to meet longer-term development needs stretching well beyond the plan period, thereby ensuring that Green Belt boundaries will not need to be altered at the end of the plan period.

52. The site at Knowsley Village that is identified as safeguarded land would provide about 1,093 dwellings which, as the Council points out, represents a little over two years’ supply at the target rate of 450 dpa. Adding this to the 898 dwelling ‘headroom’ that is built into the Council’s housing land supply and the 129 dwellings on identified sites which are expected to be built after

---

8 AD53: Supplementary information to Council’s Statement CH12B – Note on ‘Sedgefield’ scenarios.
2028 gives a total supply of about 2,120 dwellings beyond the plan period, or just under 5 years’ supply at the current rate. This quantum of supply beyond 2028 does depend on all the sites identified being built out to their stated capacity. Based on historic delivery in Knowsley, this might be considered quite optimistic. On the other hand, it is reasonable to expect that by 2028 new regeneration opportunities will become available, so the safeguarded land would, as now, be supplementary to the supply from the urban areas.

53. Many local residents argue that it is not possible to predict what the needs of the borough are likely to be beyond 2028 and that there is no justification for taking further land out of the Green Belt at this time. Obviously the social and economic factors facing the borough in 2028 cannot be predicted, though the recent population and household projections to 2037 do give an indication of the possible scale of future growth. These suggest that notwithstanding the very small (400 person) increase in population projected over the 2028-2037 period, an additional 1,750 households would be formed. Because the KLPCS strategy is to significantly boost the supply of dwellings above the official projections with the aim of rebalancing the housing market and stemming the out-migration of working age population, it is likely that demographic growth over the 2028-37 period will be appreciably above these figures. In this context an identified supply of 2,120 dwellings post 2028 seems reasonable.

54. It is pertinent that, in order to promote regeneration, the Merseyside Green Belt was expected to have a life-span of about 15 years when designated in 1983. However the Green Belt in Knowsley has endured largely unchanged (apart from minor boundary adjustments) since its inception, a period of 32 years. This gives a local perspective on the timespan over which new Green Belt boundaries might be expected to last, though it is impossible to predict how long the Green Belt releases proposed in the KLPCS will be sufficient to meet future needs.

55. Taking all these factors into account, the safeguarding of land which could accommodate about 1,100 dwellings is an appropriate response to the Framework’s objective that Green Belt alterations should meet longer term development needs stretching well beyond the plan period, and it satisfies the “where necessary” test.

56. To accord with the Framework, the KLPCS should make clear that safeguarded land is not allocated for development at the present time, and that permission for housing development will only be granted following a review of the Local Plan. This is explicitly stated in the text of the new chapter on SUEs. However, it was pointed out in the representations on Main Modifications that the new policy SUE 1 could be interpreted as committing development of the safeguarded land after 2028, which is not the case – such a decision would only be made following a review of the Plan. Minor adjustments have been made to the wording of policy SUE 1 and paragraph 6A.10 (MM22) to more

---

9 The main purpose of the 898 dwelling ‘headroom’ is to provide flexibility in the identified supply and to give greater confidence that the 8,100 dwelling target will be delivered over the plan period. If the identified sites do not deliver the number of dwellings expected over the plan period and this flexibility allowance is ‘used up’ by 2028, the post-2028 supply would drop to about 1,480 dwellings or just over 3 years’ supply at the target rate. This reduction in post 2028 supply would be smaller if, as certain evidence suggests, some of the non-delivery were to come from SUEs taking longer to build out, in which case they would contribute to the post 2028 supply.
accurately reflect national policy; a consequential amendment (MM19) is also made to the box following paragraph 6.45.

ISSUE 3 – WHETHER THE PROVISION FOR EMPLOYMENT IS SOUND IN TERMS OF ITS SCALE AND DELIVERY

Objectively assessed employment need

57. Eight forecasting models were assessed to determine the growth in jobs and the consequent employment land requirement, using two methodologies – economic forecasting and historic trends. Three econometric models are based mainly on work carried out by 4NW at regional level during preparation of a replacement for the now revoked RSS. These distribute regional forecasts to individual districts based on two different housing growth projections and work carried out for the Regional Economic Forecasting Panel. They forecast job growth over the Plan period ranging from 3,170 to 4,790 jobs, which translates into a land requirement of between 6ha and 83ha depending on the floorspace densities and plot ratios applied. A fourth econometric model used in preparation of the Joint Employment Land and Premises Study (JELPS) forecast the creation of 1,530 new jobs between 2008 and 2026; because it is predicated on a major sectoral shift from manufacturing to office employment, which uses much less land, this scenario has a maximum land requirement of 2ha.

58. The historic trends methodology calculates average build rates of the past and projects these over the future plan period. Three forecasts are taken from the JELPS. The first is based on work undertaken for the RSS, when the economic outlook was very different; this proposes a land requirement of between 220ha and 380ha, the higher figure derived from the inclusion of backlog and a 20% flexibility allowance. Using long term trends from 1995 produces a land requirement of between 224ha (for the period to 2008) and 180ha (for the period to 2013) without a flexibility allowance. Thirdly, if short term trends are used, the equivalent requirement varies from 136ha (for the period 2005-10) to 66ha (for the period 2008-13). The Council provides a fourth historic model which reduces the land take in the early years of the plan period to reflect the economic downturn; this gives a requirement of 176ha, again with no flexibility allowance.

59. Forecasts of between 2ha and 380ha represent a huge variation in land requirement and it is difficult to provide a rational justification for such extremes. The economic methodology takes no account of policy aspirations or interventions and clearly produces a low land requirement, based in part on a shift from industrial to office-based employment; the JELPS study views this as representing the absolute minimum of land needed. Historic take-up projections vary significantly depending on the period chosen and can be skewed by significant high or low levels of development in certain years. The LCR Overview Study notes that historic land take-up projections often result in higher requirements than other methodologies, and may not take account of recent changes to the economy.

60. In the Submission KLPCS the Council chose to base employment need on averaging historic take-up trends over the periods 1995-2012/2013, giving a minimum requirement of 183.5ha. Close investigation of this period reveals
rapid growth prior to 2001 and much less take-up since then. This is demonstrated by 9-year take-up rates of 13.66ha per annum during 1995/6-2003/4 compared with 6.36ha per annum during 2004/5-2012/13. The high take-up in the first half of the period mirrors high levels of public investment which were prevalent at that time as a result of Objective 1 status and other programmes. Whilst some public funding is still available, many believe that it is unlikely to return to previous levels. The Council’s EVA indicates that the likelihood of speculative development is also much reduced.

61. Given the commuter flows between Knowsley and neighbouring authorities which reflect the travel-to-work area of the northern part of the Liverpool City Region, it is pertinent to consider how other LCR authorities are treating employment need. Although some, including Halton and West Lancashire, are using the historic trends methodology, the two Councils with which Knowsley has greatest interaction, Liverpool and St Helens, are using labour demand/econometric forecasts to calculate their employment land requirements. Thus it may be prudent to moderate Knowsley’s land requirement based on the higher yielding historic trends methodology to avoid being too ‘out of kilter’ with these immediate neighbours. This would also be consistent with the likely switch to higher density office employment in parts of the borough.

62. Overall, whilst there is no compelling reason not to use the historic trends methodology, such use should be tempered by the changed economic circumstances likely to prevail over the Plan period. Accordingly, based primarily on a more realistic projection of historic take-up rates and the prospect of more limited public investment in future, but also having regard to the much lower forecasts derived from the econometric methodology and the adoption of this approach by Knowsley’s closest neighbours, the Council’s land requirement of 183.5ha seems a little on the high side. It is probably towards the upper end of the range of need rather than the minimum; a small reduction in the minimum land-take figure is therefore justified.

63. During the examination the Council adjusted the employment requirement by subtracting from the historic take-up figure for 1995-2012/13 the losses of employment land to non-employment uses which were previously part of the assessment. This gives a minimum Plan requirement of 164ha at an average of 9.11ha per annum. It might reasonably be argued that an objective assessment of employment need which is based on historic trends should not include take-up for non-employment uses in any event.

64. Taking all these factors into account, a modest reduction in the minimum employment land requirement to 164ha is appropriate. MM8 and MM9 set out the revised assessment and are necessary for the Plan to be justified.

Employment land supply

65. The Submission KLPCS was based on a supply of employment land estimated to be 170.15ha at April 2013. With the addition of 11ha taken-up over the period 2010-13, there appeared to be a small (17.15ha) surplus of
employment land above the minimum requirement. However, during the examination it became apparent that the supply includes a high proportion of sites that are constrained for a variety of reasons. There are long-standing UDP allocations where the realistic prospect of delivery is uncertain, residual areas of land on existing industrial estates which have potentially been available for many years, and many poor quality sites that are unattractive to the market. These problems are reflected in the EVA, which identifies viability concerns for all types of employment development.

66. During the adjournment the Council re-assessed the supply and applied a similar methodology to that used for housing land, ie discounts ranging from about 15% (sites with full planning permission) to 75% (expansion land where there is no known intention to develop). In this revised assessment, the land supply that is potentially developable over the Plan period falls by about one-third to around 112ha. This risk-based approach is a much more focused and realistic assessment of the employment land supply and was broadly supported by many participants. The net result (as shown in MM9) is a current shortfall against the objectively assessed need of about 41ha (once the 164ha overall need is reduced by the 11ha already developed).

67. Because all the potential employment land from within the urban areas is included in the identified supply, the deficit has to come from the Green Belt if the quantitative need is to be met. The Council proposed four “reserve locations” for employment use in the Submission KLPCS, intended for development in the latter part of the Plan period, which would provide about 45ha of employment land. But the authority recognises that the delay in their availability would fail to address two sectoral deficiencies in the existing land supply. Studies for the LCR, including the Liverpool SuperPort proposal, have identified a substantial demand from the logistics/distribution sector for large sites that have excellent access to the primary road network. And at a local level, the JELPS study identified the need for a successor to the largely developed Kings Business Park at Huyton. Most of the identified supply comprises sites on existing industrial estates or business parks which would not adequately address these immediate needs.

68. Two of the Green Belt sites proposed for employment use would address the sectoral deficiencies. Land south of the M62 is located beside the M62/M57 junction and has good potential for logistics/distribution uses, while the mixed use allocation at Knowsley Lane Huyton is recommended in the JELPS as a successor to the nearby Kings Business Park. To facilitate the early delivery of these sites and thereby help to address the immediate needs, the Council decided that, as with housing, the Green Belt employment land should be released on adoption of the Plan. The Council also accepted that, because much of the potential employment land at South Prescot Regeneration Area is now likely to be developed for housing, there is a need to maximise the employment use of the other mixed use location, Knowsley Lane Huyton. MM8, MM9, MM12, MM19 and MM22 make the necessary modifications.

69. Overall, when the total risk-assessed supply (about 157ha) is compared to the
employment land requirement over the remaining Plan period (153ha), there is a very small surplus – in effect, need and supply are in balance. But meeting the quantum of identified need is only one part of the Council’s approach to employment land. The Plan’s strategy aims to build on the success of major employment locations such as Knowsley Industrial and Business Parks (where there is a proven critical mass), to provide a choice of sites that are attractive to a range of business investors, and where possible to deliver the sectoral opportunities identified in the LCR studies. The Council believes that this balanced approach fulfils the employment needs of local people, thereby helping to address the high levels of socio-economic deprivation, whilst also ensuring that Knowsley continues to contribute to the economy of the LCR. I agree; by meeting employment needs in a manner which reflects the overall objectives and strategy of the Plan, the approach to economic development is sustainable and in principle meets the ‘exceptional circumstances’ test necessary to justify the release of Green Belt land.

70. Many in the development industry argue that Knowsley is well placed to benefit from the forecast growth in logistics and that it will be losing new investment unless more prime Green Belt land is allocated. A small number of sites were proposed to meet this perceived demand; the detailed arguments are appraised in the next section. But the important point of principle is that once the identified need has been met, the ‘exceptional circumstances’ test of Green Belt policy becomes much harder to pass. I consider that the Council has struck an acceptable balance between meeting its employment needs and protecting the Green Belt from unwarranted development.

**ISSUE 4 - WHETHER THE CHOICE OF GREEN BELT SITES IS APPROPRIATE WHEN CONSIDERED AGAINST REASONABLE ALTERNATIVES, AND WHETHER THE POLICY FOR THE GREEN BELT IS SOUND**

71. The principle that Green Belt releases are essential if the strategy of the KLPCS is to be delivered, and consequently that the exceptional circumstances test of the Framework is met, has been established under issues 2 and 3. Under this issue I address concerns about the methodology used to identify Green Belt sites, and test whether the most sustainable sites have been selected having regard to the extent of harm to the Green Belt, suitability and accessibility factors, and other relevant considerations. I also consider the soundness of policy CS 5, which sets out the approach to land that remains in the Green Belt.

*Green Belt site selection process*

72. The process of identifying the most appropriate Green Belt locations has been conducted on a consistent basis at sub-regional level, with Knowsley and Sefton undertaking a joint study and West Lancashire adopting a similar methodology. The joint study focused initially on the contribution that parcels of land make to Green Belt purposes such as openness, the maintenance of essential gaps and the prevention of urban sprawl. Land not discounted at this stage was assessed against a range of constraints and accessibility criteria. Twenty potential locations in Knowsley, together with four alternatives put forward by landowners/developers, were then tested against a range of sustainability criteria and the extent they would contribute towards the Plan’s spatial vision and objectives.
73. Some representors criticise the complexity of the process and the potential for obfuscating the selection of sites. I acknowledge that parts of the analysis, such as the sustainability appraisal of Green Belt locations, are extremely detailed and that there is the potential for overlap between individual criteria; moreover, in the absence of any weighting of criteria, the results of the analysis are highly dependent on the criteria selected. My approach is to use these studies as the starting point and to apply my own planning judgement to discern whether there are significant inconsistencies or errors.

74. Whilst there are some points in the analysis where a different finding might reasonably have been reached on a particular criterion for a specific site, this is not surprising when making value judgements and does not necessarily invalidate the entire process. I consider that the methodology is fundamentally robust and I find no compelling evidence that the analysis has led to an illogical or unfounded selection of sites. And the approach complies with the Framework, in that it achieves an appropriate balance between the aim and purposes of the Green Belt and the need to promote a sustainable pattern of development which is consistent with the Plan’s overall strategy.

Individual Green Belt sites (1) – SUEs included in the Plan

75. Most of the SUEs attracted widespread public opposition on many non-Green Belt grounds including extra traffic and congestion, air pollution, stress on local schools and health facilities, loss of wildlife and biodiversity, increased risk of flooding, loss of agricultural land and many other matters. These are legitimate and understandable concerns, for the harm caused by the loss of sizeable tracts of protected countryside and the effects on the neighbouring communities should not be dismissed lightly. Many of these concerns are addressed in the examination of individual SUEs below. But local opposition is not in itself sufficient reason to reject a proposal; decisions should be taken in the light of all material considerations, including local needs and priorities, guided by relevant national policy. In planning for the future needs and prosperity of its communities, the Council has to strike a balance between many competing interests, and difficult decisions have to be made.

76. The SUEs are shown diagrammatically on the modified Key Diagram and Area Maps (MM3) and on detailed maps in the Allocation Profiles (MM37). Some house-builder representatives believe that the notional capacities of the residential SUEs given in the Allocations Profiles are too low and should be increased. The dwelling numbers have mostly been calculated on a consistent basis at a density of 30dph (applied to the developable areas), which is the same density as used in the SHLAA and is slightly below the average density achieved on all sites in Knowsley in the recent past. Whilst it is important that the best possible use is made of the Green Belt allocations, there are other factors to be considered. In particular, a key objective of the KLPCS is to broaden the range of housing in Knowsley by providing family housing that is attractive to workers occupying professional/managerial positions in local businesses, as this group is under-represented in the borough. Furthermore, many of the SUEs are in peripheral suburban locations where high average densities may not be appropriate. The modified Plan makes clear that the notional capacities are only estimates, and where a number is stated in the policies, it is qualified by “approximately” – it is not a maximum. In these circumstances I consider that the assessment of dwelling yields is appropriate.
Bank Lane, Kirkby

77. This former inert waste tip has substantially re-vegetated and lies on the edge of Kirkby close to Tower Hill regeneration area. The Green Belt study indicates that development would not result in the loss of a countryside use, there would be little noticeable incursion into the narrow gap to Melling and Maghull, and Simonswood Brook would form a defensible Green Belt boundary. The site is within reasonable walking distance of the shops and facilities in Kirkby town centre, and the A506 Bank Lane is a bus route with a regular service to Kirkby and Liverpool. Subject to the developable area avoiding the land at risk of flooding (which is also a local wildlife site), this location is clearly suitable for housing and the harm to the Green Belt would be minimal. The Council’s decision to approve outline and detailed applications for housing on the Bank Lane site merely confirms the appropriateness of this allocation.

East of Knowsley Industrial and Business Parks

78. This employment SUE extends eastwards from Knowsley Industrial and Business Parks, straddling the main A580 East Lancs Road. The larger northern part is mostly occupied by utilities (electricity substation and water works) which are not currently available, while the southern part is high quality farmland. The development would cause a small loss of countryside and a very slight reduction in the wide gap to St Helens, though it would not affect the separation of settlements. It would also breach the existing strong Green Belt boundary formed by Cooper’s Lane and Ormskirk Road, though a re-alignment along existing minor roads provides the opportunity for creating another strong, defensible boundary.

79. Because part of the site is previously developed land, the amount of ‘best and most versatile’ agricultural land that would be lost is proportionately smaller compared with the overall size of the SUE. The site is located next to the established employment locations on both sides of the A580 dual carriageway, which may encourage journeys by car, though it is also close to a main bus route. Although the triangular southern part is too small and not an ideal shape for a major user, it is large enough to provide an attractive gateway opportunity which would help to raise the profile and assist in the regeneration of the adjacent employment parks. Overall the benefits of this location for employment use, coupled with the limited harm to the Green Belt and the limited loss of countryside and agricultural land, justify selection of this SUE.

Knowsley Lane, Huyton

80. This long, narrow strip of mainly agricultural land lies between the northern edge of Huyton and the M57 motorway. Although development would encroach into the relatively small gap between Huyton and Knowsley village, the perception of the gap being narrowed would be diminished by the presence of the motorway, which is a major physical barrier and would provide a highly robust boundary to restrict further sprawl. Thus the harm to the Green Belt would be limited. On the other hand the loss of countryside would be keenly felt because, with the motorway forming the new boundary, the development would remove the pleasant rural setting to the northern part of Huyton. A site survey established that the agricultural land is grade 3b so the loss would not be of the ‘best and most versatile’ category.
81. The site is in a highly sustainable location for both housing and employment development and is close to the North Huyton regeneration area. It is within walking distance of a range of local facilities and employment opportunities and there is a regular bus service along Knowsley Lane. The western part of the site includes playing pitches, amenity space and woodland, but this area has been excluded from the developable area and is allocated in policy SUE 2a for public open space. Given the importance of identifying a location in the borough for a high quality business park, and the loss to housing of a potential alternative opportunity at Carr Lane, Prescot (see below), it is appropriate that the majority of this location be specifically identified for employment use; MM22 addresses this matter. Despite the loss of a rural setting to Huyton and the harm (albeit limited) to the Green Belt, the significant sustainability benefits and consistency with the KLPCS strategy justify this allocation.

Edenhurst Avenue, Huyton

82. This vacant, derelict former privately-owned sports ground lies on the eastern edge of the Liverpool conurbation and has established areas of housing to the north, west and south. Although the site is part of a narrow gap between Huyton and the built-up area of Liverpool, it contributes relatively little to the purposes of the Green Belt and its loss would not significantly reduce the gap. Moreover, there would be no loss of countryside. The existing line of poplar trees on the eastern boundary would represent a defensible border to what is a logical ‘rounding-off’ to the Green Belt boundary in this location.

83. The site is in an accessible suburban location with many community facilities and services close by (albeit in Liverpool City) and good bus services within walking distance, though local shops are slightly further away. Road access to the site would either be through the residential roads to the north (preferred by the developer) or from Childwall Valley Road to the south (preferred by the Council). Despite local objections, there is no evidence that the roads through Bowring Park could not accommodate the increased traffic, though some highway improvements may be required. The important point is that only one access is provided, as a through route from Roby Road to Childwall Valley Road could become a ‘rat-run’ to and from the M62 junction.

84. The southern and western part of the site is subject to flooding from the adjacent Court Hey Brook/Childwall Brook; the capacity of the site has been reduced by about half to ensure that no housing development occurs in flood zones 2 and 3. A number of houses to the north-west of the site are currently in flood zones 2 and 3a and there is understandable concern from local residents that the development would exacerbate the flood risk. If the land outside flood zone 1 is remodelled to increase both the developable area and the flood storage capacity on the undeveloped part of the site, as the intended developer suggests, then the claimed benefit of a reduction in flood risk to existing properties should be secured at detailed design stage. Most of the trees and the limited ecological value of the site are within the part that would not be developed, and the poplars are protected by a Tree Preservation Order. All other impacts can be satisfactorily mitigated, where necessary, and given the very limited Green Belt harm this is an appropriate allocation.
Land Bounded by A58, Prescot

85. The gap between Prescot and Huyton is very narrow on the southern side of the A57 Liverpool Road and much wider on the northern side, where open land extends to Knowsley Park Lane. Development of this open land would cause a partial yet noticeable incursion into the gap between these towns, consolidating the narrowness of the gap but not making it smaller than at present. There would also be a slight intrusion into the larger gap between Prescot and Knowsley village, though the presence of the A58 Prescot bypass would lessen the sense that the gap is being reduced. Moreover, the A58 dual carriageway would form a strong and defensible boundary to the Green Belt and restrict any potential encroachment onto the historic Knowsley Hall Estate.

86. The land is an important gateway location on the approach to Prescot and housing development would visibly diminish the historic town’s rural setting. This is not sufficient reason to reject the allocation, however, and could be partly mitigated by a high quality treatment of the main A57 and A58 frontages, probably incorporating a landscape buffer, and the relatively low density development envisaged by the Council. The school playing fields on the northern part of the site would be retained in open space use and have been excluded from the capacity calculation. There would be some loss of agricultural land, though part of the site is previously developed land. I understand the concern about the potential loss of the large garden centre but, as the Council indicated, this is a matter for the landowner.

87. Accessibility to local facilities and services is good, the site being within walking distance of Prescot town centre and on a main bus route. There is no evidence that the additional traffic generated by the development would create congestion in the town. Constraints such as the water mains across the site and the existing trees would be addressed in the detailed design. On balance the harm to the Green Belt and the setting of Prescot is outweighed by the positive impact the development would have on most of the Plan’s strategic objectives; accordingly this allocation is justified.

Carr Lane, Prescot

88. This former waste water treatment works, now overgrown, is part of the narrow gap between Prescot and Huyton. However the gap is interrupted in this area by the former industrial premises to the south (the South Prescot regeneration area, which now has planning permission predominantly for housing) and the M57 motorway to the west. The robust boundary created by the M57 and the large impending housing development to the south means that the perceived intrusion into the gap, and the consequent harm to the Green Belt, would be minimal. Moreover, with Prescot Brook as a defensible northern boundary, the land would represent a logical rounding-off of development in this location.

89. Access to a range of facilities and services is acceptable and public transport accessibility is good, though local shops are not within easy walking distance. The main ecological interest in the site is Prescot Brook, which acts as a wildlife corridor, while immediately to the north is a local wildlife site. Prescot Brook is also the part of the site at risk of flooding, so retention of a suitable buffer along the watercourse would address both constraints. Overall, given
the positive contribution to the regeneration area and the minimal harm to the Green Belt, the allocation is justified. The submission KLPSCS identifies the site as being acceptable for housing and/or employment use; given the recent grant of planning permission mainly for housing on the land to the south-east, which is likely to be implemented, employment use would no longer be appropriate. MM19 and MM22 adjust the Plan accordingly.

East of Halewood

90. This urban fringe location is in two separate parcels and forms part of the wide gap between Halewood and Widnes. The large SUE would represent urban sprawl and would clearly encroach into the countryside surrounding Halewood; however the impact on the overall width of the gap would be limited and coalescence would not occur. Defensible boundaries along Ditton Brook and the railway line (northern site) and Finch Lane/Lower Road (southern site) would constrain further sprawl; indeed, the area adjacent to Ditton Brook which is at high risk of flooding gives the northern parcel a very robust boundary. The presence of the Everton FC training complex on the eastern side of Finch Lane does not significantly reduce the effectiveness of this boundary because the training ground is predominantly open.

91. The SUE comprises flat, rather featureless farmland of limited landscape quality though it does provide an open countryside setting to Halewood which would be lost as a result of the development. In addition, a sizeable tract of ‘best and most versatile’ agricultural land would be lost; according to the Framework, areas of poorer quality agricultural land should take preference if they are available. However, many of the potential large sites in Knowsley are of similar agricultural land quality, so this is not in itself an overriding determinant in the identification of land for development. A broad swathe of land alongside Ditton Brook is in flood zones 2 and 3, but this would be excluded from the residential area and is shown as a wetland country park by the potential developers. The parcels have limited ecological value and there is no evidence of significant impacts on wildlife within or adjacent to the SUE; an existing area of woodland is likely to be retained.

92. Both parcels are well related to the facilities and services in Halewood and are close to regular bus routes; Halewood station is also within reasonable walking distance. Enhanced pedestrian and cycle linkages to these existing facilities are desirable and are sought by policy SUE 2b. The SUE accords with the strategic objectives of the Plan, being the most sustainable location available for expansion of Halewood, and there is no evidence of conflict with the regeneration programmes in neighbouring Liverpool city. The harm to the Green Belt and the loss of agricultural land, whilst significant, would be proportionate to the scale of development, and overall the need for new housing and the coherence with the Plan’s strategy justify this allocation.

South of Whiston

93. Development of this major location to the south and east of Whiston would consolidate development in the north-east quadrant of the M62/M57 junction, removing any last semblance of a gap between Whiston and Huyton at this junction. It would also consolidate development in the relatively narrow gap between Whiston and Rainhill, though it would not reduce the minimum width
of the gap. Fox’s Bank Lane and the M62 motorway provide potentially robust boundaries to contain further urban sprawl, though the latter is not intended to be the limit to southwards expansion (see Cronton Colliery below). Primarily because of the large scale of this SUE, there would be considerable harm to the Green Belt.

94. The site comprises gently undulating farmland, scattered woodlands and various urban fringe uses which provide an attractive countryside setting to the southern part of Whiston. There would be substantial loss of this setting, significantly changing the character of Whiston on the main approach from the M62/M57 Tarbock Island junction. There would also be some loss of ‘best and most versatile’ agricultural land though, as at Halewood, many potential locations in Knowsley borough have a similar constraint. The existing woodland, water body and wildlife sites would be retained to form significant ecological features within the development and the impact on wildlife is capable of being successfully mitigated. The outdoor sports pitches and cemetery in the northern part of the site would be retained; moreover, based on the preliminary development framework submitted by one of the likely developers and the Council’s assessment of the developable area, large areas of the site would become publicly accessible open space. The concern of residents living in the mobile homes of Halsnead Park is understandable, for their rural setting would be lost; it is important that their residential amenity is respected in the design of the development.

95. The northern part of the SUE is well related to the shops, services and facilities in Whiston and all but the south-eastern part has reasonable public transport accessibility. Highway capacity is a major challenge because the development would create substantial additional traffic on local roads which, at peak hours, experience queues. Subject to the findings of detailed studies, highway improvements are likely to be required on a number of roads including Windy Arbor Road, Cronton Road and the Tarbock Island junction. Highways England is satisfied that appropriate highway mitigation measures can be delivered by means of the modified SUE policies, and there is no evidence to the contrary.

96. A scheme of around 1,500 dwellings would require provision of substantial new infrastructure, both on- and off-site, as the Council’s recent high-level infrastructure study demonstrates. All these matters are requirements of policy SUE 2c, which includes appropriate primary school provision. The case for new secondary school provision being specifically identified in the policy is not directly supported by evidence, for even with the projected pupil demand from SUEs, there is likely to be a small surplus of secondary places in the Preston/Whiston/Cronton/Knowsley Villa area by 2028. This analysis does not take into account cross-boundary movements between Knowsley and St Helens and the fact that the two schools closest to South Whiston are currently over-subscribed. Nevertheless, because clause 2d of policy SUE 2c requires delivery of “key infrastructure and services, including…”, the policy allows for provision of secondary school places should a specific need be identified by more detailed studies.

97. The proximity of this location to one of the more desirable settlements of the borough has attracted considerable developer interest, making it the site most likely to succeed in rebalancing the housing market and meeting many other strategic objectives of the Plan. Moreover, without this site the borough would
not be able to meet its objectively assessed housing needs, for no better alternative has been identified. Overall, whilst the harm to the Green Belt, the loss of countryside and the loss of good agricultural land would be considerable, the extent of the loss is proportionate to the large scale of the development. In the absence of any overriding constraints, and as the harm would be clearly outweighed by the benefits, the allocation is in the interests of sustainable development and is sound.

98. Turning to the detailed wording of SUE policies, the comprehensive development of this SUE (as required by policies SUE 2 and SUE 2c) is vital, as piecemeal implementation by individual land owners could threaten a coherent, high quality neighbourhood and provision of the necessary infrastructure. For this reason it would not be appropriate to exclude the former Saunders Garden Centre from the SUE, notwithstanding the now-lapsed planning permission for housing development.

99. I do not accept the argument that clause 4 of policy SUE 2, which requires the master plan to accord with any SPD, is unsound and potentially unlawful. The purpose of the SPD is to provide further details of the policy requirements for this allocation, which would guide the preparation of a master plan. Any SPD which strayed beyond its lawful scope would, as the Council acknowledges, be susceptible to legal challenge. Furthermore, the SPD would be a material consideration with which, under clause 4, the master plan “should” comply. Unlike the mandatory requirements of clause 1 (Development within the SUEs “must”…..), non-compliance with the SPD is not ruled out should compelling arguments be made to justify an exception.

**Land South of M62 (Cronton Colliery)**

100. This location south of the M62 would encroach into the open countryside gap between the settlements north of the motorway and Cronton village to the south-west. Its inclusion depends in large measure on the South of Whiston location, for without it Cronton Colliery would be isolated from any settlement. The area proposed for employment development would be confined to the farmland close to the motorway because the former colliery site is owned by the Land Trust and is earmarked for a country park. Fox’s Bank Lane and Cronton Road would provide robust eastern and southern boundaries to the Green Belt. Parts of the employment area are constrained by flooding and wildlife designations and would be excluded from development.

101. I accept that the selection process is rather difficult to comprehend,\(^{11}\) but it is not always possible to devise a rational methodology which addresses the inherent complexity of countless site-specific circumstances; as stated above, I regard the selection process as a starting point rather than an end in itself. In this instance, the proposed distribution of uses across the combined sites has the important benefit of limiting the encroachment of built development into the countryside. There is merit to the argument that the country park is an open use which should be retained in the Green Belt, but I also appreciate that because the divide between these two uses is not yet known, a robust boundary to the employment allocation could not be fixed at this stage. On

---

\(^{11}\) The site was originally discarded in the Green Belt study but returned when its two parcels were combined and the surrounding roads were considered to provide strong boundaries to the Green Belt, notwithstanding that only a small part of the development would extend to these roads.
balance the proposed Green Belt boundary satisfies the tests of the Framework and is acceptable.

102. A major benefit of this site is its strategic gateway location at a major motorway junction which should appeal to inward investors, particularly in the logistics sector. Although policy SUE 2c highlights the location’s Use Class B8 potential, other employment uses are not excluded. The fact that the plots could not accommodate the very largest logistics operations does not unduly diminish its attractiveness to this market. The argument that an alternative area east of Knowsley Industrial Park is preferable for employment development is not supported by compelling evidence. Overall, the harm to the Green Belt and countryside is outweighed by the major benefit of this location and the absence of preferable alternatives to meet the need for employment land; consequently this allocation is sound.

Knowsley Village safeguarded land

103. This large area of very gently sloping agricultural land consists of two main sections, one to the east of Knowsley village and the other to the south, connected by a narrow link close to Home Farm. The land is not allocated for housing during the plan period and any future decision about its development would be taken as part of a local plan review. But as the purpose of the safeguarding designation is to identify land which is likely to be suitable for housing in the longer term, it is necessary to consider the implications of future development to determine whether there is justification for removing the land from the Green Belt.

104. Two of the five purposes of the Green Belt would be affected – there would be a significant loss of the relatively narrow gap between Knowsley Village and Stockbridge Village/north Huyton, though a visible gap would remain, and encroachment into the countryside. I do not accept the argument that, because Knowsley is termed a rural village in policy CS 1, it does not meet the criteria for Green Belt release. The village is identified as a Primarily Residential Area in the UDP and as an urban area on the KLPCS key diagrams, so the safeguarded land would, quite properly, be situated between the Green Belt and the existing urban area. In terms of boundaries, the land is physically well contained – the wall and mature tree belt which extends around the western edge of the Knowsley Park Estate provide a strong boundary to most of the land, while the B5202 Knowsley Lane robustly defines its western extent. Overall, although the harm to the Green Belt would be considerable, it would be commensurate with the large scale of the potential development.

105. The impact of development on the setting of the Grade II designated historic park and garden would be very limited because the wall and tree belt which define the boundary of Knowsley Park provide a strong physical and visual barrier. To allow an appreciation of the wall and to respect the setting of the heritage asset I would expect some separation to be maintained between the wall and any housing, perhaps in the form of a residential road or a strip of open space, but this is a detailed design matter to be addressed at a future stage. I note that Historic England has not objected to the proposed safeguarding and, in applying the policy of the Framework, the very limited (‘less than substantial’) harm to the significance of the asset is outweighed by the benefit of land which has the potential to provide new homes in an area
where suitable land is very difficult to find. Similar considerations apply to the setting of Knowsley Village Conservation Area, which abuts the northern tip of the safeguarded land – any impact would be slight, particularly at the low density envisaged, and would be outweighed by the provision of housing. There is no compelling evidence that the setting of the listed buildings within Knowsley Park or Knowsley village would be harmed by the development.

106. Some of the safeguarded land is classed as grade 2 ‘best and most versatile’ land on the large-scale Agricultural Land Classification (ALC) maps; however a detailed site assessment reveals no grade 2 land and only a small area of grade 3a, the majority being grade 3b. The ALC maps show this land to be of the same quality as the Halewood and South of Whiston SUEs, and there is no evidence that alternative sites of lower land quality are available which are equally suitable in other respects for safeguarding. As to ecological value, the local wildlife site designation has been removed following updated ecological information. The small areas of woodland within the site could be retained and their ecological interest mitigated as part of any future development.

107. Because the safeguarded land abuts a relatively small settlement rather than one of the borough’s main towns, it is a less accessible location by sustainable transport modes than the SUEs and would have a higher level of car dependence. Primarily for this reason, coupled with the other factors above, the Council found that the location performed less well against sustainability criteria and should be held back for longer term development rather than being allocated as a SUE. However the village does have a reasonable range of facilities (local shops, primary school, health centre) and is on a bus route, so it is not an inherently unsustainable location, and the borough’s premier employment location (Knowsley Business and Industrial Park) is very close by. There is no cogent evidence that the local road network could not satisfactorily accommodate the traffic generated by any future housing development.

108. I understand the argument that the large scale of development would have a disproportionate impact on this relatively small settlement and that the character and identity of a rural village would be lost. Clearly the impact would be significant, but the original small rural village (largely defined by the Conservation Area) has already been dwarfed by sizeable areas of suburban housing to the east and south. These appear to have been successfully integrated to form the enlarged village that exists today, and there is no obvious reason why a similar scale of development in future could not do the same. In the absence of a sizeable alternative location for long term development which has fewer adverse effects overall, the selection of this safeguarded land is sound.

*Individual Green Belt sites (2) – Alternative sites proposed by objectors*

**Axis Business Park**

109. This flat, elongated site is sandwiched between the existing distribution park at Gillmoss (which is in Liverpool City) and the M57 motorway. When fully developed, the distribution park will cover all the land up to Knowsley Brook which forms the boundary between Knowsley and Liverpool. Thus the entire gap remaining between the Liverpool urban area and the town of Kirkby is in Knowsley borough: the gap is very narrow, about 400m wide, and is bisected
by the motorway. Development of the site as a further phase of the business park would remove the majority of the gap, leaving just a narrow strip on the north-eastern side of the motorway.

110. The site comprises mostly rough grassland with a few scattered trees and has limited intrinsic value in landscape terms. But it does perform an important role in visually separating Liverpool from Kirkby, providing a small open break that is particularly noticeable from the motorway, hence its designation as part of the M57 Green Belt Corridor Strategic Green Link. Development of a substantial part of this small gap would manifestly be contrary to the Green Belt purposes of checking the unrestricted sprawl of urban areas, preventing neighbouring towns from merging, and safeguarding the countryside from encroachment.

111. The site is ideally located for distribution use, having excellent access to the primary road network and direct links to Liverpool SuperPort. And the evidence suggests that constraints such as flood risk could be satisfactorily addressed. Nevertheless, the argument that the site would represent a more sustainable pattern of development than other sites proposed for employment use in the Plan fails to give sufficient weight to its function as a critical part of the Green Belt. To the extent that the site has greater benefits from an economic development standpoint than the allocated SUE employment sites, such benefits are clearly outweighed by the fact that the other sites would cause appreciably less harm to the Green Belt. For these reasons the omission of this site is sound.

Shrogg’s Farm

112. This small triangular site fronts the A580 and is bounded on the other two sides by the elevated M57 and one of its slip roads. Whilst it contains a dwelling and a number of buildings grouped towards one corner, plus a telecommunications mast, the majority of the site is open. It lies in the middle of the same narrow corridor as the Axis site above, with about a 300m gap to the built up areas of Liverpool and Kirkby, and is part of the M57 Green Belt Corridor Strategic Green Link. Although any development would be contained by roads and trees and not be visible in the wider landscape, it would nevertheless represent a loss of openness and encroachment onto a small area of countryside, contrary to Green Belt policy. It could also contribute potentially to the merging of settlements by setting a precedent for further development in the strategic gap.

113. In locational terms many of the same considerations apply as to the Axis site. Highway access from the A580, whilst technically challenging, would provide direct access to the strategic road network; the site is also within easy reach of public transport and other employment areas. It is clearly well-placed to make a small contribution to the economy of the Liverpool City Region, as the interest in the site from developers demonstrates. Turning to the identified constraints, the road embankments appear to limit the prospect of flooding and, given its small size, the loss of high grade agricultural land would not be significant.

12 Although the land is not in agriculture or other productive use, it is part of the corridor of countryside which separates Liverpool and Kirkby.
114. The argument that the essential gap is an artificial barrier to development, particularly as there is no such essential gap between Halewood or Huyton and the Liverpool conurbation, seems to misunderstand the purpose of Green Belt policy. One aim of the Green Belt is to prevent the merging of settlements, such as happened at Halewood and Huyton prior to Green Belt designation. Because historic encroachment has reduced the width of the gap in various parts of Knowsley, the maintenance of what little gap is left is critical if settlements like Kirkby are also not to merge with the conurbation. The remaining gap is very fragile and is subject to constant pressure for development, but the Council is right to resist that pressure by choosing to apply the Framework’s robust approach to the Green Belt. Because there are other employment sites which are not in such a highly vulnerable part of the Green Belt, the omission of this site is sound.

**Epicentre**

115. This large scale proposal has two distinct elements – new housing (including a care home) in the gap between Knowsley village and Knowsley Business Park, and an extensive equine-based leisure complex mostly on land between the M57 motorway and the established neighbourhood of Fir Tree Drive, Croxteth. The aim of Epicentre is to provide a polo complex to national standard, a modern pentathlon and hospitality centre and a riding school; the housing development is necessary to cross-subsidise the equine activities.

116. The gap between Knowsley village and Knowsley Business Park is very small, comprising a single agricultural field on the south side of School Lane and a belt of trees and a paddock on the north side. Contrary to the views of the Epicentre promoter, the field and the trees/paddock provide a recognisable and material open break between residential and commercial development. Thus the Council’s argument that it represents an essential gap is based on a sound application of Green Belt policy; whilst it is not part of the strategic gap between Knowsley settlements and Liverpool, it is nonetheless an important local gap which would be lost if the Epicentre scheme was built. And in common with other sites above, the fragility of the gap and its vulnerability to development add weight to the need to protect it.

117. The benefits of the Epicentre scheme – a prestigious equestrian facility, employment, training and educational opportunities, new leisure and improved recreational facilities, and enhanced access to the countryside - are acknowledged. But the argument that housing on this site would cause less harm to the Green Belt than that on the safeguarded land east of Knowsley Village is not accepted. Much greater harm would result from the coalescence of Knowsley village and Knowsley Business Park with the Epicentre scheme when compared with the limited encroachment into the countryside arising from the eastward spread of Knowsley Village; adding to the latter the limited impact on the setting of Knowsley Park does not change the analysis. The omission of this site is sound.

**Lydiate Lane**

118. The site was originally proposed by multiple landowners and comprised a

---

13 This principle emerged from consultation at an early stage of the assessment process, see paragraph 5.26 of the Green Belt Study (EB08).
sizeable parcel to the north-east of Halewood which abutted the Liverpool conurbation. The main landowner subsequently withdrew, leaving the owners of a relatively small former tree nursery between Lydiate Lane and North End Lane to propose their site. At the eastern end of the site a loose-knit cluster of dwellings and other buildings front North End Lane, while to the south-east a development of 6 dwellings is currently under construction.

119. All the land north of Lydiate Lane and north-west of Gerrards Lane is part of a narrow wedge of countryside that separates Halewood and Netherley. The variety of uses (golf course, waste water treatment works, smallholdings and areas of scrub land) are typical of the urban fringe. I observed on my visits that the tree belt on the southern side of Lydiate Lane largely hides the housing estate beyond and forms a very strong boundary to the Green Belt in this location. The loose cluster of dwellings on North End Lane is surrounded by open land and appears to be part of the surrounding countryside. The proposed housing site would substantially alter the balance between built form and open land, consolidating development in this location and resulting in a small but distinct residential ‘outlier’ beyond the edge of the settlement. Because it would encroach into the open break that separates Halewood and Netherley, and not have a logical or particularly well-defined boundary, there would be a risk of further incursions into this part of the Green Belt in future.

120. I do not accept the argument that the focus on Green Belt criteria has been at the expense of selecting more sustainable sites which fit better with the spatial strategy. Green Belts contribute to sustainable patterns of development, not detract from them, as the Framework and PPG make clear. And not all Green Belt land has equal value, for some areas make a greater contribution to openness and Green Belt purposes than others, as the Council’s study recognises. The openness of the Lydiate Lane site is an important component of the narrow wedge of countryside on the fringe of the Liverpool conurbation. The fact that it is accessible, relatively free of environmental constraints and available immediately does not justify its release from the Green Belt in circumstances where the housing need has been met on sites which provide a better balance between the various (and often competing) objectives of both the KLPCS and national policy. I understand why a landowner is aggrieved about the former haulage/scrap yard adjacent being granted residential planning permission as means of tidying that site, but this is not good reason to remove the Lydiate Lane site from the Green Belt.

Burtons Way Plots

121. This relatively small site lies between M57 junction 6, the A506 and the north-western edge of the Axis site. In the Council’s Green Belt Study the site was part of the same parcel as the Axis site and very similar considerations apply. Fundamentally it is part of the narrow gap between Kirkby and Liverpool City which, because of its limited width and vulnerability, it is essential to preserve if the Green Belt in this locality is to serve any purpose at all.

Pinfold Lane, Knowsley Village

122. This site lies within the essential gap between the western edge of Knowsley village and Liverpool City. The gap is relatively wide at this point and development would be well contained by Pinfold Lane and a belt of woodland.
which, together, would form a strong Green Belt boundary. The concern about this site relates to its prominence within Knowsley Village Conservation Area. The Conservation Area Appraisal highlights the rural character and setting of the conservation area as key attributes, and these would be substantially eroded by housing development on this site. None of the other sites, including the safeguarded land east and south of Knowsley village, would have such a deleterious impact on important heritage assets. Thus the evidence supports the Council’s view that the adverse impact of developing this site would be greater when compared with the allocated SUEs.

**Development in the Green Belt – Policy CS 5**

123. Policy CS 5 includes a strategic development management clause which sought to restrict all inappropriate development in the Green Belt without any regard for the “very special circumstances” test of national policy. The clause also aimed to preserve the visual and recreational amenities of the Green Belt, thereby highlighting just two of the opportunities identified in paragraph 81 of the Framework for enhancing the beneficial use of Green Belts. Whilst the focus on visual and recreational amenities is an acceptable local response to national policy, a restriction on all inappropriate development is not. MM11 adds the necessary “very special circumstances” test and adjusts the overall approach of this clause to ensure consistency with the Framework.

124. Clause 7 of policy CS 5 stated that ‘major existing developed sites’ in the Green Belt, where limited infilling and redevelopment is appropriate in principle, will be identified in the SADP. Because the former provision for specified ‘major developed sites’ in the Green Belt has been replaced in the Framework by a general approach which applies to all previously developed sites, it is argued that clause 7 is unnecessary and potentially confusing. But though formal identification of major sites is no longer a requirement of Green Belt policy, this does not mean that it is wrong to identify them if local circumstances justify such an approach. The success of the previous policy in facilitating the high quality development of Kings Business Park demonstrates the benefit of specifying major sites in a Local Plan. Consequently this clause is sound, subject to MM11 which ensures greater consistency with national policy by replacing the phrase “existing developed sites” with “previously developed sites” and specifies the Green Belt tests in greater detail.

**ISSUE 5 – WHETHER THE PLAN ESTABLISHES A SOUND FRAMEWORK FOR TOWN CENTRES AND REGENERATION AREAS**

**Town centres**

125. Policy CS 6 establishes a hierarchy of centres across the borough comprising three town centres, three district centres and local centres identified in KLPCS Appendix B. The boundaries of the centres, the primary shopping areas and the identification of development opportunities are to be determined in the SADP. As sought by the Framework, MM8 and MM10 amend the sequential approach to site selection in policy CS 4 and the associated text to give preference to accessible sites in edge-of-centre and out-of-centre locations.

126. The retail study identified that none of the town centres performs well, with substantial leakage of both convenience and comparison goods expenditure to
stores outside the borough. The Plan establishes the proposed quantum (expressed as a range) of new comparison and convenience floorspace for each town centre, aimed at increasing the levels of expenditure retention by relatively modest amounts. It also sets out the preferred phasing of this development; although there is no strong evidence to justify the need for phasing, because it is termed “indicative” this element of policy CS 6 is sound.

127. Huyton is the most successful town centre as a result of recent investment, and the limited amount of growth proposed is soundly based on the strategy of consolidation outlined in the retail study. Kirkby and Prescot town centres perform particularly poorly and, because they are among the areas in greatest need of comprehensive change, they are designated Principal Regeneration Areas. The Plan sets out strategies aimed at reversing the current decline in these centres.

**Kirkby town centre**

128. To support the comprehensive regeneration of Kirkby town centre and to create sufficient capacity for this regeneration to be retail-led, policy CS 10 designates residential and open space land south of Cherryfield Drive as an expansion of the town centre and primary shopping area. This reflects the outline planning permission granted in 2011 for mixed use town centre redevelopment which includes provision of a 14,000 sq m foodstore, 16,300 sq m of comparison retail units and associated car parking on an edge-of-centre site south of Cherryfield Drive. The permitted scheme is a much smaller version of the retail component of the “Destination Kirkby” proposal (which included a new stadium for Everton FC) that was refused planning permission by the Secretary of State in 2009. The reduction in retail floorspace and the closer proximity of the shops to the existing town centre north of Cherryfield Drive overcame many of the retail objections which contributed to rejection of the Destination Kirkby scheme.

129. Some local concern about the permitted scheme remains. The argument that the scale of retail floorspace is still too large for Kirkby is not supported by evidence on capacity. The total retail floorspace would be less than the surplus capacity (to 2013) identified by the Inspector at the Destination Kirkby inquiry, and though it would slightly exceed the 2016 capacity identified in the Council’s 2010 shopping study, ample surplus capacity is shown to exist by the end of the Plan period. On the other hand, the capacity figure is based on an ambitious target of clawing back expenditure that currently goes outside the Kirkby catchment. Despite the intentions of the Plan, there is no certainty that retailers will take all the floorspace proposed.

130. The other main argument is that there is sufficient land to accommodate the required floorspace within the existing town centre; consequently it is said that the southern expansion involves the needless demolition of 72 dwellings and loss of urban greenspace. This claim is based in part on the report of the Destination Kirkby Inspector, who found no convincing argument that the need for retail development of an appropriate scale could not be met within the existing town centre. The Council acknowledged the benefits of regenerating the existing town centre before expanding southwards in its assessment of the permitted proposal. However, having examined the availability, suitability and viability of sequentially preferable alternatives, it concluded that there was
insufficient land in the town centre to provide the critical mass believed necessary to make the scheme viable.

131. Circumstances have changed since the permission was granted. Most significant is a reduction in the size of the proposed foodstore from 14,000 sq m to 8,216 sq m and a commensurate increase in comparison goods floorspace (ie the total retail floorspace is unchanged). Part of the justification for the amount of comparison goods floorspace in the original scheme was that comparison retailers would be attracted by the footfall generated by a very large superstore. There must be doubts that a superstore some 40% smaller would act as such a strong magnet for comparison retailers; filling all the comparison floorspace is made even harder by the approved increase in quantity. 14 Other changes include a smaller than anticipated catchment population as a result of the 2011 Census data, and cancellation of the Merseytram project which (albeit marginally) frees up some land within the town centre.

132. Clearly the approach in the Submission Plan remains appropriate if the extant permission (or any further amendment to it) is built. Retail development south of Cherryfield Drive would expand the town centre and require its boundary to be re-defined in the SADP, as proposed in policy CS 10. If the permission is not implemented, however, policy CS 10 should not simply be taken as justifying town centre expansion. The Council should examine critically any subsequent new proposal in light of other changes and, if town centre expansion is again proposed, undertake a further sequential assessment to determine whether the need could appropriately be met within the existing town centre in accordance with national policy. MM16 and MM17 amend the plan accordingly, and delete the need to safeguard the route of the now cancelled Merseytram route to Kirkby town centre.

Prescot town centre

133. Prescot town centre has declined significantly in recent years, partly from competition with the edge-of-centre Cables Retail Park which provides the main superstore and some of the national retailer representation in the town. Nevertheless, retail studies show that Cables Retail Park has been beneficial for the settlement of Prescot by causing an overall increase in trade retention. Recent survey evidence demonstrates that while some town centre shoppers also visit the retail park, and vice-versa, the proportion of linked trips is relatively small. I observed that there is a sizeable gap between the retail frontages of shops in Prescot town centre and those in the retail park, with the physical separation exacerbated by a steep gradient from the main shopping precinct.

134. The Plan’s strategy is to encourage new retail development and a wider mix of uses in the existing town centre and to improve linkages and integration with the retail park by extending the town centre boundary along Sewell Street. In principle this is sound. Retail development on the vacant Sewell Street site would help bridge the gap in retail frontage between the two destinations and

14 At the final hearing session in June 2015 I was advised that the intended developer of the Cherryfield Drive scheme had pulled out, though the Council indicated that the extant planning permission could potentially be implemented by another developer. This does not change the approach set out in the modified KLPCS.
contribute to a more attractive (and less steep) pedestrian route; extending the town centre boundary should assist this objective. And the support for town centre diversification facilitates alternative uses which may be attracted by the historic assets of the centre, thereby helping to address the decline.

135. The retail park developer argues that the town centre should be extended to include the retail park. The main benefit to the retail park of its inclusion in the town centre would be removal of the need for new floorspace to satisfy the long-standing sequential and impact tests of policy CS 6. But the very purpose of these ‘town centre first’ tests is to protect established centres such as Prescot. There was no evidence of development having been refused at the retail park through the application of these tests, so continuation of the current policy seems unlikely to harm the retail park. But extending the town centre across the retail park would make it easier both to attract new retail floorspace to the retail park and for existing town centre stores to relocate to the newer location. Because there is potential for harm to Prescot town centre from the suggested change, the boundary proposed in the Plan is appropriate.

136. The provisions of policy CS 14 which relate to Cables Retail Park include uses being confined to convenience or bulky goods retailing and no increase in the current retail floorspace. The Council accepts that these restrictions are more properly addressed by the sequential and impact tests of policy CS 6 and proposes modification MM21 to delete them, which is supported. As to the argument that the amount of new comparison floorspace proposed at Prescot should be increased, the historic nature of much of the town centre constrains delivery of sizeable areas of new floorspace. Moreover, the floorspace figures in the Plan are indicative rather than a maximum, and are supplemented by an unallocated reserve which could be sufficient to accommodate most of the floorspace at Prescot identified in the evidence base.

Other Principal Regeneration Areas

137. The measures identified in the Plan to secure comprehensive regeneration of the other Principal Regeneration Areas - North Huyton and Stockbridge Village (policy CS 9), Knowsley Industrial and Business Parks (CS 11), Tower Hill (CS 12) and South Prescot (CS 13) – are generally supported and are sound. The modifications made to the PRA policies relating to major employment locations (CS 11 and 13), which require office development to comply with the sequential test of the Framework, are for consistency as they repeat a requirement of policy CS 4.

138. Policy CS 11 promotes the development of a local service centre at South Boundary Road, within the Knowsley Industrial Park, to meet the small scale shopping and service needs of the workforce. The owner of the nearby Academy Business Park argues that the identified site is not deliverable and that, as an alternative, its land is suitable and available for such uses. The need for a ‘Services Hub’ in this location is based on a recommendation of the strategic framework for the regeneration of the Park, which identified a weakness in the service offer. South Boundary Road is a main distributor road across the Park and already contains a small group of shops at Admin Road, so its identification as the preferred location for the ‘Services Hub’ is based on sound evidence and reasoning. Nevertheless, policy CS 11 leaves the identification of specific land allocations to the SADP. Academy Business Park
is located off the roundabout at one end of South Boundary Road and it seems to me that there is sufficient leeway in the policy to enable consideration to be given to this location when a site is allocated in the SADP, especially if the preferred site cannot be delivered.

**ISSUE 6 – WHETHER THE PLAN ESTABLISHES A SOUND FRAMEWORK FOR RE-BALANCING THE HOUSING MARKET**

139. To better meet local housing needs and address out-migration, a key objective of the Plan is to re-balance Knowsley’s housing market by widening the range, type and choice of market sector housing, particularly in regeneration areas, and by providing affordable housing in different tenures. Regeneration areas such as North Huyton, Stockbridge Village and Tower Hill have high proportions of social rented stock and, because they are areas of low demand, they have limited attraction to the market sector. As a major landowner in these areas, the Council is committed to working in partnership with developers to deliver housing-led regeneration. Methods include the release of packages of sites in both high and low value areas (enabling cross-subsidy), phasing land receipts, and risk sharing by taking a proportion of the sales receipts. These practices demonstrate that the Council has an important and active role to play in pursuing its housing objectives. They also give some comfort that the mix and type of housing needed in these areas is likely to be delivered.

**Affordable housing**

140. The SHMA identified a high current need for affordable housing (568 units per annum), though this figure does not apply over the whole plan period. There is no prospect of this level of need being met by the social housing sector, so the Submission KLPCs sought to achieve a proportion of affordable housing in association with the delivery of market housing. A target of 25% on sites of 15 dwellings or more was proposed in policy CS 15 unless it could be demonstrated that this would render a scheme unviable. However, the Council’s viability study appears to show that, when provided alongside even relatively low standards of other policy requirements, 15% affordable housing is not viable on most urban sites in two of the three value areas.

141. Paragraph 173 of the Framework stresses that the obligations and policy burdens imposed on development should not be of such a scale as to threaten its ability to be developed viably. During the adjournment the Council reflected on the appropriateness of a borough-wide target and decided to introduce a variable rate, reducing the proportion of affordable housing in urban areas to 10%. This aligns more closely with the viability evidence and, though it will not cover all situations, it should reduce significantly the occasions when viability has to be considered for site-specific reasons.

142. Some developers argue that the major infrastructure necessary for very large Sustainable Urban Extensions renders 25% affordable housing unachievable; however, this is not borne out by the viability evidence. But, importantly, policy CS 15 retains the provision for a lower proportion of affordable housing

15 For example, Code for Sustainable Homes level 3, a minimum highways contribution and a low design standard.
in specific cases if the policy requirement is shown not to be viable. **MM23** introduces the 10% rate within the urban areas; it also clarifies the requirement for subsidy to be recycled in the event that a property ceases to be within the affordable housing sector. With these changes the Plan is sound.

143. Policy CS 15 states that the tenure of affordable housing provision will be informed by evidence regarding local housing needs. The associated text indicates that the current need, taken from the SHMA, is 75% affordable rent and 25% intermediate housing. However the SHMA figure is based on very limited evidence, merely reflecting the proportional split over a two year delivery period. In light of the very low availability of intermediate housing (about 4% of the annual turnover), the SHMA’s call for more intermediate housing and the Plan’s objective to deliver a more balanced housing stock, there is a case for a higher proportion of intermediate housing. **MM24** addresses this matter appropriately, making clear that the latest evidence of need and the objective of re-balancing the stock will inform the tenure split sought. The modification also acknowledges that the tenure mix can influence the amount of affordable housing that is delivered.

**Housing sizes and design standards**

144. A mix of dwellings sizes is sought by policy CS 17, with developers of larger schemes being required to demonstrate how their mix contributes to re-balancing the housing market. This flexible approach should allow the Council and developers to respond to changing circumstances – for example, a potential need for smaller homes as a result of an ageing population or the introduction of welfare reforms - and is sound.

145. Policy CS 17 also required compliance with a number of national design standards such as Code for Sustainable Homes, Building for Life and Lifetime Homes. During the very long examination the Government has wound down the Code for Sustainable Homes and separated planning and technical requirements for new housing by consolidating essential requirements into the Building Regulations. To ensure that the Plan retains flexibility and reflects the latest position on housing standards, the reference to Code for Sustainable Homes is removed from policy CS 17. And in advance of the Government’s decision on the need for and application of local design standards, the policy was amended to encourage rather than require compliance with Building for Life and Lifetime Homes criteria, and to delete the inference that Building for Life is part of Government policy. **MM25**. The necessary measures are secured by...

**Gypsy and traveller provision**

146. There are no permanent gypsy and traveller sites in Knowsley and there is very little evidence of unauthorised encampments. The most recent assessment of need for gypsy and traveller accommodation was carried out in 2008 for Merseyside and identified a requirement for a small number of...

---

16 On 1st October 2015 the Lifetime Homes ‘accessible dwellings’ criteria were replaced by optional Technical Standards under the Building Regulations which can only be required through a local plan policy. Because modified policy CS 17 includes a reference to “equivalent replacement standards”, and as compliance is “encouraged” rather than required by the policy, it remains appropriate as an aspiration of the Council.
pitches in Knowsley. This study is somewhat out-dated, however, and the Council is participating with its Liverpool City Region partners in an updated study which will reflect current national policy in Planning Policy for Traveller Sites (PPTS). Consequently the Submission Plan indicates that the selection of sites to meet the identified need for gypsy accommodation will take place in the next stage of Plan preparation, the SADP. The Council points out that a similar approach has been taken by neighbouring authorities whose plans have been found sound.

147. This is not ideal, for establishing at least the level of need to be met should be a task for a Core Strategy. But as the Green Belt represents an especially strong policy constraint in Knowsley, there is a persuasive case for an up-to-date sub-regional approach, based on PPTS, which involves collaborative working with neighbouring authorities (as happened with the joint Green Belt study for general housing). Because it would not have been sensible to further delay the examination to enable this work to take place, the pragmatic decision was taken to allow the traveller issue to be determined at SADP stage. \textit{MM26} modifies policy CS 18 to clarify that the pitch target and any five year requirement will be identified in the SADP. It is important that the PPTS requirements are addressed urgently and this modification is necessary to make the Plan sound.

### ISSUE 7 – WHETHER THE POLICIES FOR PROTECTING AND ENHANCING THE NATURAL AND BUILT ENVIRONMENT ARE JUSTIFIED AND CONSISTENT WITH NATIONAL POLICY

\textit{Green infrastructure and open space}

148. As sought by the Framework, the KLPCS is based on thorough and up-to-date assessments of open space, sports and recreational facilities. These indicate that the borough’s communities are generally well served in quantitative terms, with large surpluses in the amount of amenity greenspace and parks/gardens in many community areas. Some deficiencies do exist, however, and despite investment in recent years which has led to significant improvements, in some locations the quality of some open space remains poor.

149. Policy CS 8 seeks to protect, manage and/or enhance the existing green infrastructure and, where necessary, to identify new greenspace allocations in the SADP. The policy is broadly sound, though specific adjustments are necessary. To better reflect the approach to biodiversity in the Framework, recognition is required for the possibility of mitigation or compensation where biodiversity loss cannot be avoided, while the focus on endangered species is broadened to include designated sites and priority habitats. \textit{MM14} and \textit{MM15} make the appropriate changes to policy and text.

150. Detailed criteria for the protection of urban greenspace are set out in policy CS 21, which includes two distinct tests that are much more elaborate than, and go beyond, the requirements of paragraph 74 of the Framework. Clause 3,

---

\textsuperscript{17} This approach was supported in the representations submitted at Submission Consultation stage and there were no objections to it during the examination. The updated LCR study had not been published when the second session of hearings was held in July 2014, at which main modifications to the Plan were discussed.
which sought to resist any loss of greenspace if it would cause significant harm to amenity and other considerations, did not reflect the balance that is inherent in the Framework; the inclusion of a phrase which allows the benefits of the proposal to outweigh the loss addresses this matter. The clause 2 criterion relating to sports provision required modification because it was unclear and was capable of misinterpretation. And whilst it is appropriate for the Council to identify in the SADP any Local Green Spaces (a new protection for specially valued open spaces introduced by the Framework), the criteria used to determine whether a particular greenspace qualifies should be in the KLPCS. **MM29** addresses all these matters.

151. To guide the implementation of policy CS 21, the KLPCS includes local quantitative and accessibility standards for greenspace (based on “Substantial Residential Areas”) and outdoor sports provision (based on the four main community areas). This is a very detailed and somewhat mechanistic approach to greenspace provision, derived from long-established quantitative standards, though it broadly accorded with national guidance at the time it was prepared. Nevertheless, the need for each relatively small residential area to provide a full complement of greenspace needs to be applied flexibly given the large surpluses in some typologies in many areas. Moreover, the approach currently advocated by Sport England for sports provision increases the emphasis given to qualitative and availability factors. Policy CS 21 indicates that the standards of provision will be kept under review, and in so doing the Council should take the most up-to-date methodologies into account.

**Historic environment**

152. Clause 1b of policy CS 20 sought to prevent demolition of historic assets, or development which would adversely affect such assets or their settings. Whilst this is a laudable aim which is likely to be achieved in most cases, the Framework promotes a balanced approach which recognises that there may be occasions where the public benefits of a development outweigh the loss or harm to the heritage asset. The Framework also distinguishes between ‘substantial’ and ‘less than substantial’ harm or loss to heritage assets.

153. The modifications proposed by the Council to address this matter included the balance of harm versus benefit and reflected the proportionate approach to the degree of harm, as sought by national policy. However, as Historic England points out, the modifications deleted the reference to the setting of heritage assets. Although there is reference to ‘setting’ elsewhere in policy CS 20, this is in the context of new development integrating with the setting of historic assets, which is a different consideration. There is no reason why ‘setting’ should not be reinstated into clause 1b, as it was in the Submission Plan, though it should now appear in both the ‘substantial harm’ and the ‘less than substantial harm’ sub-clauses (and, for consistency, in the singular). The necessary adjustment to this modification is included in **MM28**.

**Design quality**

154. A comprehensive and appropriate framework intended to promote attractive design of new buildings and spaces is provided by policy CS 19. In addressing climate change, clause 3 of the policy requires new development to integrate a
range of matters (sustainable construction, biodiversity, flood risk and so on) addressed in other policies of the Plan. The KLPCS is intended to be read as a whole, so while I understand the Council’s desire to have individual policies which are all-encompassing, this approach (which applies to many other policies as well) results in a Plan which is appreciably longer and more complex than is necessary (albeit not unsound). Nevertheless where such matters are addressed, the wording should be consistent and relevant cross references should be included throughout; **MM27** adjusts the policy accordingly.

*Sustainable and low carbon development*

155. At the time the Plan was prepared, policy CS 22 quite properly encouraged new development to move towards a zero carbon standard by reference to two established national methodologies, the Code for Sustainable Homes and BREEAM. The Government subsequently announced a comprehensive review of housing design standards which has led to mandatory national standards for residential construction being included in the Building Regulations. To avoid having outdated policies and to allow flexibility once the final form of the changes was known, the Council decided to remove all reference to sustainable construction standards (including BREEAM, which remains) from KLPCS policies. Now that the new regime is in place, the Council will consider whether to have local policies during preparation of the SADP. This is an acceptable interim measure and is secured by **MM30** and **MM31**.

156. Clause 7 of Submission policy CS 22 requires major developments to include decentralised renewable and low carbon energy systems, where technically feasible and economically viable. However, there is no compelling evidence that a decentralised energy network would be feasible or viable for the large scale housing schemes proposed in the Plan, let alone schemes above the 10 dwelling/1 hectare threshold for major developments proposed by the Council. Consequently the inclusion of such a requirement is not justified; **MM30** includes the necessary deletion.

157. Clause 8 of Submission policy CS 22 identifies Knowsley Industrial and Business Parks as a Priority Zone for a decentralised energy network; this is based on a number of studies, including one at Liverpool City Region level, which highlight the potential of this area for decentralised energy. Within the Priority Zone, new development is required to enable connection to an existing, planned or future decentralised energy network, subject to feasibility. I appreciate the concern that the ‘feasibility’ consideration might be taken as not including viability, because in some instances in the Plan both factors are separately mentioned. However, in the case of policy CS 22 it seems to me that viability would be one of the matters to be taken into account when assessing feasibility, for if a particular scheme would not proceed solely on the basis that meeting the connectivity requirement made it unviable, then the development would not be feasible. Whilst it would have been preferable for the Council to adopt a consistent approach in the KLPCS, the omission of ‘viable’ in this instance does not make the Plan unsound.

158. Clause 9 of the policy states that additional Priority Zones may be identified in the SADP. As the potential for district heating at certain specific locations is identified in the evidence base, this provision is sound.
159. In June 2015 a Written Ministerial Statement (WMS) introduced new considerations designed to enable local people to have the final say on wind turbine applications. Two requirements have to be met: a proposed turbine must be in an area identified as suitable for wind energy development in a Local Plan, and it must be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing. Whilst KLPCS policy CS 23 gives general support for proposals that produce renewable and low carbon energy, the Plan does not identify any area as suitable for wind energy development. The Council intends to address this matter fully at the SADP stage; as an interim measure, and to provide the necessary clarity in the KLPCS, MM32 modifies the text to indicate that policy CS 23 does not apply to wind energy development, which in advance of SADP adoption will be considered against relevant national policy including the WMS.

**ISSUE 8 – WHETHER THE POLICIES ON TRANSPORT AND SUSTAINABLE RESOURCE MANAGEMENT ARE APPROPRIATE AND JUSTIFIED**

*Transport*

160. Policy CS 7 is a wide ranging yet suitably concise policy which outlines an overall transport strategy, sets out criteria with which new development should comply, and identifies the main strategic transport schemes and programmes towards which contributions will be sought when mitigating the transport impact of development. This approach is broadly supported and is consistent with the Framework’s promotion of sustainable transport systems which minimise the need to travel and maximise the use of sustainable transport modes.

161. Two modifications to policy CS 7 are warranted. The requirement for new development to include ‘emerging new technologies’ that will mitigate carbon emissions and improve air quality lacks precision and could have viability implications in that such technologies may be untested; substituting this with ‘measures’ and adding flexibility in the form of ‘where appropriate’ satisfactorily resolves this matter. And in light of the confirmation during the examination that Merseytram will not now proceed, it should be removed from the list of strategic transport schemes. MM13 addresses these matters.

162. Policy CS 7 and paragraph 5.86 give appropriate recognition to the aerodrome safeguarding requirements of John Lennon airport. The Council will consider whether to reproduce the Civil Aviation Authority Safeguarding Zone maps at the SADP stage of plan preparation, though it is rightly aware of the need to ensure that the most up-to-date maps are referred to.

*Flood risk*

163. Some objectors to SUEs which include land at risk of flooding argue that the site selection process has not properly taken into account flooding and its consequences for the surrounding community. However, guided by the Level 2 Strategic Flood Risk Assessment carried out during plan preparation, all land in Flood Zones 2 and 3 has been excluded from the potential developable area and the assessment of residential capacity. Policy CS 24 aims to prevent development that would cause an unacceptable risk of flooding, whether on or
off the site, and directs development to areas of low probability of flooding. In addition, a site-specific Flood Risk Assessment is required for all development which affects an area of flood risk. By these means the KLPCS has adequately addressed the important issue of flood risk and provides an appropriate framework to guide development in affected areas.

Minerals

164. Apart from one site where brick clay is extracted intermittently, there are no active mineral sites in Knowsley. The sub-regional Local Aggregates Assessment found that Knowsley has no resources of primary aggregate material and that its main means of contributing to the supply of aggregate is through the use of secondary and recycled material. Surface coal exists under parts of the borough, but there are no current proposals for extraction. In these circumstances the strategic approach to managing mineral resources in policy CS 25 is appropriate. Detailed policies for the extraction of minerals and recycling of aggregates are delegated to the SADP.

165. The part of policy CS 25 that proposes to identify Mineral Safeguarding Areas in the SADP refers to viable deposits of economic importance, which differs from the terminology of "resources of national and local importance" in the Framework. MM33 substitutes this phrase to ensure compliance with national policy. The Framework also requires mineral planning authorities to maintain landbanks of at least 7 years for sand and gravel and 10 years for crushed rock; MM34 adds a paragraph to the text indicating that landbanks significantly in excess of these periods exist in the sub-region of which Knowsley is part.

ISSUE 9 – WHETHER THE MECHANISMS FOR NEW INFRASTRUCTURE AND IMPLEMENTATION ARE SUFFICIENTLY ROBUST TO ENSURE EFFECTIVE DELIVERY OF THE PLAN

Infrastructure

166. The Infrastructure Delivery Plan (IDP) reviews existing infrastructure provision in Knowsley, identifies planned new provision and future requirements, examines funding mechanisms, and identifies all infrastructure projects considered critical to delivery of the KLPCS. It has been prepared in conjunction with key stakeholders and is intended to be regularly updated. Reflecting the findings of the Economic Viability Assessment, the IDP recognises that viability for some types of development in Knowsley is challenging. This is carried through into KLPCS policy CS 27, which acknowledges that negotiations may be necessary for some sites if meeting the policy requirements in full would place development at risk. To assist this process, the EVA recommends that the Council considers a hierarchy of policy requirements to guide any negotiation process.

167. The Council proposes an additional clause to policy CS 27 (MM35) which sets out a hierarchy of developer contributions, ranging from those which are essential if the development is to take place to those which are 'encouraged' by the Council's planning policies. The accompanying table gives examples of the type of developer contributions applicable to each of the four categories of the hierarchy. In a borough where viability is a major concern, this provides a
transparent and consistent framework and assists in ensuring that the cumulative impact of the various standards and policy requirements does not put implementation of the Plan at risk, as sought by the Framework.

**Implementation**

168. Accompanying each Submission KLPCS policy is a summary of the main delivery mechanisms. The separate Monitoring Framework establishes over 100 Monitoring Indicators and the units of measurement by which the Council intends to assess implementation of the Plan’s policies. However, no target was given for well over half the Monitoring Indicators, and there was no information about any remedial action that might be taken if the target was not met. Because this framework would not have allowed meaningful monitoring of many of the Plan’s policies against measurable targets, nor any indication of what action might be taken if implementation was not occurring as anticipated, a robust and effective implementation strategy was not in place.

169. **MM36** introduces a new Appendix D which gives the relevant targets for each policy, identifies key risks and mitigation measures, and sets out any potential remedial action and the triggers for such action. This provides a robust and transparent framework against which the implementation of the KLPCS can be measured and kept under review, thereby helping to ensure that the Plan remains viable and deliverable.

**Assessment of Legal Compliance**

170. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

<table>
<thead>
<tr>
<th>LEGAL REQUIREMENTS</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Local Development Scheme (LDS)</td>
<td>The Knowsley Local Plan: Core Strategy is identified within the approved LDS (July 2013) which sets out an expected adoption date of June 2014. The Core Strategy’s content is compliant with the LDS, though its timing has slipped as a result of adjournments necessary during this examination.</td>
</tr>
<tr>
<td>Statement of Community Involvement (SCI) and relevant regulations</td>
<td>The SCI was adopted in May 2007 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed ‘main modification’ changes (MM).</td>
</tr>
<tr>
<td>Sustainability Appraisal (SA)</td>
<td>SA has been carried out and is adequate.</td>
</tr>
<tr>
<td>Appropriate Assessment (AA)</td>
<td>The Habitats Regulations AA Screening Report (October 2012) sets out that the Plan may have some negative impact on sites outside the Borough, and AA has been carried out and is adequate.</td>
</tr>
<tr>
<td>National Policy</td>
<td>The Core Strategy complies with national policy except where indicated and modifications are recommended.</td>
</tr>
</tbody>
</table>
The Core Strategy complies with the Act and the Regulations.

Overall Conclusion and Recommendation

171. The Plan has a number of deficiencies in relation to soundness and/or legal compliance for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the Act. These deficiencies have been explored in the main issues set out above.

172. The Council has requested that I recommend main modifications to make the Plan sound and/or legally compliant and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix, the Knowsley Local Plan: Core Strategy satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Martin Pike
Inspector

This report is accompanied by the Appendix containing the Main Modifications
## Appendix – Main Modifications

The modifications below are expressed either in the conventional form of strikethrough for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the Submission KLPCS (July 2013), and do not take account of the deletion or addition of text.

<table>
<thead>
<tr>
<th>Ref</th>
<th>Page</th>
<th>Policy/Paragraph</th>
<th>Main Modification</th>
</tr>
</thead>
</table>
| MM1 | 35   | Policy CS 1      | Amend Policy CS 1 clause 1 (e):  
e. A review of Green Belt boundaries to meet longer term  
Removal of the Sustainable Urban Extensions identified in  
policies SUE 1, SUE 2, SUE 2a, SUE 2b, and SUE 2c from the  
Green Belt to help meet needs for housing and employment  
development, and maintaining the openness of remaining  
Green Belt areas. |
| MM2 | 37   | Paragraph 5.6    | Insert at end of paragraph 5.6:  
A number of locations (referred to as Sustainable Urban  
Extensions) have been removed from the Green Belt to ensure  
an adequate supply of land for housing and employment  
development, on which further details are set out in Chapter 6A. |
| MM3 | 38   | Key Diagram and Area Maps | Replace Key Diagram with new Key Diagram set out at the end of this Appendix.  
Similar changes are made to Area Maps 6.1, 6.2, 6.3 and 6.4. |
| MM4 | 39   | Policy CS 2      | Amend Policy CS 2 clause 1 and Principle 1:  
1. New development in Knowsley and the preparation of  
subsequent stages of the Local Plan will be expected to support  
the following development principles:  
**Principle 1:** Promote sustainable economic development,  
tackle the causes of deprivation and disadvantage and narrow  
the gap between the richest and poorest neighbourhoods by:  
a. Meeting needs for new housing, employment, retail and  
other service provision;  
b.-d. Improving business productivity and employment levels in  
Knowsley;  
-b-c. Reducing economic, environmental, education, health and  
other social inequalities between Knowsley and other parts  
of the UK; and  
-b-c. Providing opportunities for positive lifestyle choices and  
health improvement for people of all ages. |
| MM5 | 42   | Policy CS 3      | Amend Policy CS 3 clauses 1-3:  
1. Provision will be made for 8,100 new dwellings to be  
delivered in Knowsley between 2010 and 2028, at an annual  
average of 450 dwellings per annum. This is a minimum net  
figure, accounting for conversions, changes of use to and from  
residential use, and clearance of dwellings via demolition and is |
<table>
<thead>
<tr>
<th>Ref</th>
<th>Page</th>
<th>Policy/Paragraph</th>
<th>Main Modification</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>required to meet the need for new housing over the Plan period.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>2. The broad indicative distribution of new housing development to be delivered over the plan period will be as follows: Huyton and Stockbridge Village (33%)/(36%); Kirkby (15%)/(16%); Prescot, Whiston, Croston and Knowsley Village (33%)/(32%); and Halewood (19%)/(16%).</td>
</tr>
</tbody>
</table>
|     |      |                  | 3. Land for housing development will be subject to phased release identified to ensure that a five year supply of deliverable sites is maintained at all times\(^{(75)}\). This will support the efficient use of available land and protection of urban regeneration priorities, as outlined in policy CS 1 "Spatial Strategy for Knowsley" and policy CS 2 "Development Principles". Green Belt land for new residential development will only be released in line with the criteria set out in policy CS 5 "Green Belt". Land identified for housing development within the Sustainable Urban Extensions will be released subject to the requirements of policies CS 5 and SUE 1 to SUE 2c.  

*Amend Footnote 75:* 
A five year supply of housing land will be able to accommodate 2,250 dwellings, which is five times the annual target of 450 dwellings per annum. The five year land supply will also need to include an allowance for any "shortfall" accrued against the target from 2010 onwards. Subject to historic delivery rates, national planning policy requires local authorities to identify an additional "buffer" of either 5% or 20% on top of their five-year housing land requirement. The buffer required may change throughout the plan period in line with future monitoring and will be reported on an annual basis via the Council's Monitoring Report and/or Strategic Housing Land Availability Assessment. |
| MM6 | 45   | Housing Trajectory | Replace Housing Trajectory with new Housing Trajectory set out at the end of this Appendix. |
| MM7 | 45   | Paragraph 5.24     | Amend paragraph 5.24: 
5.24 Policy CS 3 adopts a flexible approach to housing density, recognising that there is scope for densities to vary within the Borough. This variance could be based on factors like site location (e.g. high densities adjacent to town centres and transport interchanges) or desirability of housing mix (e.g. lower density housing is needed to re-balance the mix of housing in some areas). However, given housing land availability constraints which currently exist in Knowsley and the character of the Borough, densities of at least 30 and up to 40 dwellings per hectare are considered to be appropriate and lower densities acceptable only in accordance with the criteria in Policy CS3. There are some locations in Knowsley where densities of up to 40 dwellings per hectare or higher may be acceptable. |
| MM8 | 46   | Policy CS 4        | Amend Policy CS 4 clauses 2-5:  
**Scale and Distribution of Development for Employment Uses** |
2. A total of Provision will be made for at least 183.5 hectares of land will be identified to be developed for employment uses[78] between 2010 and 2028, to be located initially within the urban area primarily within the following locations:
- Knowsley Industrial Park (including Knowsley Business Park)
- Huyton Business Park;
- Kings Business Park;
- South Prescot; and
- Jaguar Land Rover (Halewood).

3. A review of Green Belt boundaries is also proposed to meet a proportion of the longer term needs. Sites identified within Policy SUE 1 have been removed from the Green Belt for this purpose will only be developed in line with the overall development principles in Policy CS 2 ‘Development Principles’ and the phasing mechanisms set out below and in Policy CS 5 ‘Green Belt’, and allocated to meet needs for a high quality business park, large scale distribution / logistics and any other appropriate uses within the Liverpool City Region key economic sectors up to 2028.

**Phasing of Release of Land Supply for Employment Uses**

4. The release of Land for employment development will be phased available to ensure that there is at all times:

   a. A range of sites and premises by size, location, type and suitability for different employment uses; and
   b. There is a sufficient range of available and deliverable sites and premises by size, location, type and suitability to meet the needs for employment development over the following five year period[79].

   *Delete footnote 79:*

   The five year supply shall be defined as 5 multiplied by the annual average required to meet the overall need for the plan period identified (i.e. 5 x 10.2 hectares = 51.0 hectares)

   **“Town Centre” Employment Uses – Retail, Leisure and Offices**

5. New retail and other main town centre uses, as defined in Appendix A 'Glossary', will be primarily located within existing town centres in accordance with Policy CS 6 'Town Centres and Retail Strategy'. A sequential approach to site selection shall be applied with locations in existing town, district and local centres of an appropriate scale being considered first, then edge of centre locations and then only if suitable sites are not available should out of centre sites be considered. For edge of centre and out of centre proposals, preference will be given to accessible sites that are well connected to the town centre.

<table>
<thead>
<tr>
<th>Ref</th>
<th>Page</th>
<th>Policy/ Paragraph</th>
<th>Main Modification</th>
</tr>
</thead>
<tbody>
<tr>
<td>MM9</td>
<td>50</td>
<td>5.32</td>
<td>Amend paragraph 5.32:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>5.32 The findings of these studies, together with an updated</td>
</tr>
</tbody>
</table>
evidence base and assessment of different future scenarios have been used by the Council to define the target requirement for employment land development in Policy CS 4. The justification for the target annual rate of employment land provision is set out in a technical paper which accompanies this Strategy (85).

Over the plan period from 2010 to 2028 the Council considers there to be a need for a minimum of 164 hectares of additional employment land, over and above what is available within the current industrial and commercial areas of the Borough. Achieving this target is likely to require release of some Green Belt land, particularly to meet longer term needs (see Policy CS 5 'Green Belt' (see Policy SUE 1 for further details). The potential range of the supply deficit taking account of other policy approaches (e.g. the more efficient use of Knowsley Industrial Park proposed in Policy CS 11) and potential losses of current employment land to other uses are set out in Table 5.1 'Employment Land Requirements: 2010/11 - 2027/28' (rounded).


Delete Table 5.1 and replace as follows:

Table 5.1A Employment Land Requirements and Supply as at 2013 Hectares

<table>
<thead>
<tr>
<th>Local Plan: Core Strategy employment requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Long term annual average take-up for employment (1995/96 - 2012/13)</td>
</tr>
<tr>
<td>Total minimum requirement for plan period (based upon 18 years at 9.11 ha per annum)</td>
</tr>
<tr>
<td>- Employment land take up to date (2010/11 - 2012/13)</td>
</tr>
<tr>
<td>= Minimum requirement remaining (2013/14 - 2027/28)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Total employment land supply</th>
</tr>
</thead>
<tbody>
<tr>
<td>UDP Allocations, inc. Allocations Under Construction and Planning Permissions</td>
</tr>
<tr>
<td>UDP Allocations currently comprising Expansion Land</td>
</tr>
<tr>
<td>UDP Regional Investment Site - Kings Business Park</td>
</tr>
<tr>
<td>UDP South Prescot Action Area</td>
</tr>
<tr>
<td>Non Allocated Expansion Land</td>
</tr>
<tr>
<td>Land with Remodelling Potential</td>
</tr>
<tr>
<td>Sustainable Urban Extensions</td>
</tr>
<tr>
<td>Other Employment Sites, inc. Under Construction and Planning Permissions</td>
</tr>
<tr>
<td><strong>Total supply</strong></td>
</tr>
</tbody>
</table>

- approx 35% discount: plan period deliverability and supply flexibility post 2028

= Minimum delivery forecast for 2013/14 - 2027/28 | 157.27 |
<table>
<thead>
<tr>
<th>Ref</th>
<th>Page</th>
<th>Policy/Paragraph</th>
<th>Main Modification</th>
</tr>
</thead>
<tbody>
<tr>
<td>MM10</td>
<td>51</td>
<td>Paragraph 5.35</td>
<td>Amend paragraph 5.35:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>5.35 Town and district centres are considered to be the most suitable location for main town centre employment uses, including offices. This is because they are the most suitable locations based upon public transport accessibility and strategic road links to support employment uses which generate a large amount of traffic, together with the additional benefits of increasing the viability and vitality of town centres. Policy CS 4 therefore requires applications for main town centre uses to be located in town centres as a first preference, with &quot;edge of centre&quot; locations being considered if a suitable town centre site is not available. If a suitable town centre or &quot;edge of centre&quot; site is not available, &quot;out of centre&quot; locations will be considered. For proposals which are outside existing centres, preference will be given to locations which are accessible by a choice of transport in accordance with policy CS 7. Office uses which can only be located in &quot;out of centre&quot; locations should be directed towards accessible locations in Knowsley's employment areas as a first preference, before other &quot;out of centre&quot; locations are considered.</td>
</tr>
<tr>
<td>MM11</td>
<td>52-53</td>
<td>Policy CS 5</td>
<td>Amend Policy CS 5 clause 1:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>1. Inappropriate development will not be permitted in the Green Belt, and the visual and recreational amenities of the Green Belt will be preserved except in very special circumstances in which it has been demonstrated that the harm to the Green Belt (including any harm to its openness, purposes or to its visual and recreational amenities) would be clearly outweighed by other considerations. Delete clauses 2-7 and replace with:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>Major Previously Developed Sites in the Green Belt</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>2. Major Previously Developed Sites in the Green Belt will be identified in the Local Plan: Site Allocations and Development Policies.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>3. Limited infilling and redevelopment of Major Previously Developed Sites in the Green Belt is considered appropriate provided it would not have a greater impact upon the openness of the Green Belt and the purposes of including land within it.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>Review of Green Belt Boundaries to meet future development needs</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>4. A number of locations (identified as Sustainable Urban Extensions and safeguarded land) have been removed from the Green Belt to accommodate development needs up to and beyond 2028. Guidance concerning the development of these locations is set out in policies SUE 1, 2, 2a, 2b and 2c. Delete footnote 86.</td>
</tr>
<tr>
<td>MM12</td>
<td>55-58</td>
<td>Paragraph 5.46-5.58</td>
<td>Amend paragraph 5.46 and add new paragraph 5.46A:</td>
</tr>
</tbody>
</table>
5.46 While additional housing and employment land supply has been identified from some of these sources, there is still a requirement for changes to Knowsley's Green Belt boundaries in order to identify a supply of housing and employment land up to 2028. Furthermore, the Council's Strategic Housing Land Availability Assessment suggests that without reviewing the Green Belt boundary, Knowsley would be unable to maintain a 5-year "deliverable" supply of housing land beyond the short to medium term. The shortfall of development land available within the urban areas of Knowsley up to 2028 is summarised in Table 5.2 'Summary of Land Supply Shortfalls and Potential Capacity from locations proposed for release from the Green Belt'.

5.46A. In the context of employment land, Green Belt release is required specifically to address Knowsley's overall development requirements up to 2028 and beyond. The immediate release of Sustainable Urban Extensions is necessary to provide an improved range, choice and quality of sites to address specific employment needs. These include provision for a high quality business park (as a successor to Kings Business Park, which is almost fully developed) and large scale distribution and logistics.

Delete paragraph 5.47, Table 5.2, and paragraphs 5.49-5.57.

Delete paragraph 5.58 and replace with paragraph 5.41A:

Previously Developed Sites within the Green Belt

5.41A. The Council wishes to allow appropriate future development within previously developed sites in the Green Belt provided the openness of the Green Belt is preserved. Such sites vary widely in type and size and smaller sites will not be identified specifically on the Policies Map. However a number of previously developed sites in Knowsley's Green Belt including Kings Business Park and several sites used for operational needs by utility companies are of a major scale. The Council intends to identify these major sites in the Local Plan: Site Allocations and Development Policies, which may also include detailed policy guidance regarding new development within them.

<table>
<thead>
<tr>
<th>Ref</th>
<th>Page</th>
<th>Policy/Paragraph</th>
<th>Main Modification</th>
</tr>
</thead>
<tbody>
<tr>
<td>MM13</td>
<td>65</td>
<td>Policy CS 7</td>
<td>Amend Policy CS 7 clause 2e:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>2. New development will be required to be:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>e. Inclusive of emerging new technologies measures that will mitigate or minimise carbon emissions and improve air quality where appropriate; and ……</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Delete Policy CS7 clause 3c and renumber following clauses:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>3c. Line 1 of the Merseytram network linking Kirkby to Liverpool City Centre;</td>
</tr>
<tr>
<td>MM14</td>
<td>69-70</td>
<td>Policy CS 8</td>
<td>Amend Policy CS 8 clauses 1b and 6c, add new clause 6d:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>1. Knowsley’s existing Green Infrastructure and its beneficial functions will be protected, managed and/or enhanced, primarily</td>
</tr>
<tr>
<td>Ref</td>
<td>Page</td>
<td>Policy/Paragraph</td>
<td>Main Modification</td>
</tr>
<tr>
<td>------</td>
<td>------</td>
<td>------------------</td>
<td>-------------------</td>
</tr>
<tr>
<td>MM15</td>
<td>73</td>
<td>Paragraph 5.95</td>
<td>Add new paragraph 5.95D:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>In some circumstances, adequate mitigation and/or compensation for biodiversity loss may be acceptable but incapable of being provided within the application site. In such cases where appropriate, priority will be given to equivalent off-site opportunities for such mitigation or, as a last resort, compensation. Such opportunities shall be prioritised in the following order:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Firstly sites in the immediate locality of and/or within any Core Biodiversity Area (to be defined as part of the Liverpool City Region Ecological Network) near to the application site;</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Secondly, sites in a Nature Improvement Area identified within the Borough (to be defined as part of the Liverpool City Region Ecological Network); and lastly</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Sites in a Nature Improvement Area identified outside the Borough (to be defined as part of the Liverpool City Region Ecological Network).</td>
</tr>
</tbody>
</table>

| MM16 | 85   | Policy CS 10    | Amend Policy CS 10 clause 1c and delete clause 2c: |
|      |      |                  | 1c. Designation of land to the south of Cherryfield Drive to permit expansion of the town centre to create sufficient capacity for retail-led regeneration with associated expansion of the primary shopping area. If necessary to create sufficient capacity for retail-led regeneration, designation of land to the south of Cherryfield Drive to permit expansion of the town centre and primary shopping area. |
|      |      |                  | 2c. Requiring development proposals to be sufficiently flexible to integrate and safeguard the potential delivery of the Merseytram Line 1 route along Cherryfield Drive. |

<p>| MM17 | 86   | Paragraph 6.22  | Amend paragraph 6.22: |
|      |      |                  | to: |
|      |      |                  | b. Sustain and promote biodiversity and (including designated sites, priority habitats and protected and endangered species) in accordance with importance and contribution to ecological networks (including protected and endangered species); |
|      |      |                  | 6. New development must be served by Green Infrastructure to meet the needs of residents and the local environment, in a manner which will: |
|      |      |                  | c. Seek to protect, maintain and where possible enhance biodiversity within and around new developments according to their designation and significance to provide space for nature; and |
|      |      |                  | d. Provide adequate mitigation and/or, as a last resort, compensation for Green Infrastructure or biodiversity loss, in circumstances where harm resulting from the development is otherwise unavoidable. |</p>
<table>
<thead>
<tr>
<th>Ref</th>
<th>Page</th>
<th>Policy/Paragraph</th>
<th>Main Modification</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>6.22 ……………Outline planning permission for a mixed use development to comprehensively regenerate Kirkby Town Centre including retail expansion to the south of Cherryfield Drive was granted in 2011. If this development south of Cherryfield Drive is not built, any future proposal involving town centre expansion will be required to justify such expansion by satisfying the sequential test within Policy CS4 and national policy.</td>
</tr>
<tr>
<td>MM18</td>
<td>87</td>
<td>Policy CS 11</td>
<td>Amend Policy CS11 clause 1:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>1. Regeneration of Knowsley Industrial and Business Parks will be supported, which encourages a mix of new high quality employment development[^110] with a particular focus on the development of:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>a. Class B1 &quot;business&quot; uses within &quot;gateway&quot; locations at: A580 West/Moorgate Road; A5208 County Road/South Boundary Road/Moorgate Road/Arbour Lane/Lees Road; and at A580 East/Coopers Lane;</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>b. Class B2 &quot;General Industrial&quot; and B8 &quot;Storage and Distribution&quot; uses north of South Boundary Road;</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>c. Class B1 and B2B8 uses south of South Boundary Road; and,</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>d. A local service centre (or &quot;Services Hub&quot;) at South Boundary Road to provide small scale shopping and services to serve the needs of the workforce within the Park.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>The references to Class B1 uses in clauses 1 a) and 1 c) above shall be subject to compliance with the sequential test in Policy CS4 'Economy and Employment'.</td>
</tr>
<tr>
<td>MM19</td>
<td>95</td>
<td>Paragraph 6.45</td>
<td>Amend Box after paragraph 6.45, bullet 4:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• To review the Green Belt boundary to meet longer term development needs (in accordance with policies CS5 &quot;Green Belt&quot;, SUE 1 'Sustainable Urban Extensions and Safeguarded Land', and SUE 2c 'Sustainable Urban Extensions - South Whiston and Land to the South of the M62') at:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Land to the north west of Prescott (for housing);</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Land at Carr Lane, to the west of Prescott (for employment uses housing);</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Land to the south of Whiston (for housing);</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Land at Knowsley Village (for longer term housing); and</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Croton Colliery and adjacent land south of the M62 (for employment uses);</td>
</tr>
<tr>
<td>MM20</td>
<td>97</td>
<td>Policy CS 13</td>
<td>Amend Policy CS13 clause 1a:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>1a. New economic development[^113], including development of high quality Class B1 “Business” uses in gateway sites on Carr Lane and Manchester Road (subject to compliance with the sequential test in Policy CS4);</td>
</tr>
<tr>
<td>MM21</td>
<td>99</td>
<td>Policy CS 14</td>
<td>Amend Policy CS14 clauses 1c and 2:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>1c. Improving linkages and integration between Cables Retail Park and the existing town centre, including appropriate new</td>
</tr>
</tbody>
</table>
town centre development along Sewell Street, and potentially extending the designated town centre boundary in this direction; and ....

2. Restructuring of retail provision within Cables Retail Park will be supported where this would:
   a. Provide for convenience or bulky goods retailing;
   b. Improve design quality and layout; and
   c. Improve linkages to Eccleston Street; and
   d. Maintain the current retail floorspace capacity of the Retail Park, inclusive of extant planning permissions.

<table>
<thead>
<tr>
<th>Ref</th>
<th>Page</th>
<th>Policy/Paragraph</th>
<th>Main Modification</th>
</tr>
</thead>
<tbody>
<tr>
<td>MM22</td>
<td>106</td>
<td>n/a</td>
<td>Add new chapter 6A: Sustainable Urban Extensions and Safeguarded Land, set out at end of this Appendix.</td>
</tr>
<tr>
<td>MM23</td>
<td>107-108</td>
<td>Policy CS 15</td>
<td>Amend Policy CS15 clause 1: 1. Within all proposed market sector housing developments which have a capacity of 15 dwellings or more, a minimum of 25% provision of affordable housing will be sought as follows: 10% on sites within the current urban area; and 25% on sites identified as Sustainable Urban Extensions within policies SUE 1 to SUE 2c. This application of these requirements will be subject to the following: a. A lower proportion of affordable housing will only be permitted where it is clearly demonstrated that affordable housing provision is being maximised within the development and that 25% achieving provision at the levels set out above would render the development not economically viable (in accordance with Policy CS27); b. Affordable housing should be provided on site and must be fully integrated with and not distinguishable from market housing provided. It must be demonstrated that affordable housing will be secured and delivered alongside the market housing; c. In exceptional circumstances where on-site provision is not suitable or feasible, the Council will accept off site provision or a financial contribution in lieu of provision; d. Demonstrable sub-division of adjoining sites, manipulation of site layouts and/or building at lower densities to avoid compliance with the requirement for affordable housing provision will be not be acceptable; e. The tenure of affordable housing provided will be informed by evidence regarding local housing needs; f. All new affordable housing delivered through this policy will be made available in perpetuity in partnership with Registered Providers should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision; and g. The size and design of new affordable housing provided should comply with Policy CS 17 ‘Housing Sizes and Design Standards’.</td>
</tr>
<tr>
<td>Ref</td>
<td>Page</td>
<td>Policy/ Paragraph</td>
<td>Main Modification</td>
</tr>
<tr>
<td>-----</td>
<td>------</td>
<td>-------------------</td>
<td>-------------------</td>
</tr>
</tbody>
</table>
| MM24 | 109 | Paragraph 7.8-7.9 | Amend paragraphs 7.8-7.9 and add new paragraph 7.9A:  
7.8 The Council's evidence base\[(119)\] indicates that the tenures of affordable housing should be mixed in order to meet local housing needs. Evidence indicates that the tenure split should be:  

<p>| | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>75% affordable rent housing</td>
<td>25% intermediate housing</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

In general terms the evidence\[(119)\] currently shows a need across Knowsley for a tenure split of 75% affordable rent and 25% intermediate housing.  
7.9 This position will be updated with regard to findings of monitoring processes, newly emerging evidence regarding local housing needs, or to reflect the emergence of new types of affordable housing products. The Council will apply this tenure split to all residential developments within which affordable housing provision is being sought on or off site. This will also be subject to monitoring as an overall target to be achieved across the Borough up to 2028. When assessing proposals within which affordable housing is being sought on or off site the Council will apply a tenure split which is based on the latest evidence of need and is consistent with the objective of rebalancing the housing stock. The Council may also consider the extent to which the net amount of affordable housing that can viably be delivered is affected by the tenure mix of housing that is to be provided.  
7.9A When affordable housing is proposed to be delivered in connection with market housing developments, the Council will normally seek a legal agreement to ensure that the affordable housing provided remains at an affordable price for future eligible households or that any subsidy is recycled for alternative affordable housing provision. |
| MM25 | 112 | Policy CS 17 | Amend Policy CS 17 clause 4:  
4. All new residential development in Knowsley will be required encouraged to comply with the following design standards (or equivalent replacement standard):  

<p>| | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>a.</td>
<td>b.</td>
<td>c.</td>
<td>d.</td>
</tr>
<tr>
<td>Building for Life Standards, in line with government policy;</td>
<td>Lifetime Homes design criteria;</td>
<td>Code for Sustainable Homes standards, as set out in Policy CS 22 ‘Sustainable and Low Carbon Development’;</td>
<td>Specific design and sustainability guidance in Policy CS 19 ‘Design Quality and Accessibility in New Development’, Policy CS22 ‘Sustainable and Low Carbon Development’ and relevant Supplementary Planning Documents[(123)].</td>
</tr>
</tbody>
</table>
| MM26 | 116 | Policy CS 18 | Amend Policy CS 18 clause 5:  
5. The Council will establish the level of need for a site or sites in Knowsley for the accommodation of Gypsies and Travellers and/or Travelling Showpeople with reference to up-to-date evidence. Due consideration will be given to the size of the site(s) required and the number of pitches which will need to be |
<table>
<thead>
<tr>
<th>Ref</th>
<th>Page</th>
<th>Policy/Paragraph</th>
<th>Main Modification</th>
</tr>
</thead>
<tbody>
<tr>
<td>MM27</td>
<td>119</td>
<td>Policy CS 19</td>
<td>Amend Policy CS 19 clause 3:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>3. To address the challenges of climate change and future changes in social, economic and environmental priorities, new development should integrate;</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>a. Sustainable design principles, with regard to national accredited standards, Policy CS 17 ‘Housing Sizes and Design Standards’ and Policy CS 22 ‘Sustainable and Low Carbon Development’ as appropriate;</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>b. Biodiversity enhancements (in accordance with Policy CS 8);</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>c. Flood risk mitigation (in accordance with Policy CS 24);</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>d. Waste recycling; and,</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>e. Energy and resource efficiency.</td>
</tr>
<tr>
<td>MM28</td>
<td>122</td>
<td>Policy CS 20</td>
<td>Amend Policy CS 20 clause 1b and insert new part bA:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>b. Prevent demolition and/or development which adversely affects would result in substantial harm or the loss of a designated historic assets subject to statutory designation or its setting, and, unless the proposal would result in substantial public benefits which clearly outweigh the harm or loss;</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>bA. Where a development proposal will result in less than substantial harm to a designated heritage asset or its setting, assess such harm against the benefits of the proposal;</td>
</tr>
<tr>
<td>MM29</td>
<td>126-128</td>
<td>Policy CS 21</td>
<td>Amend Policy CS 21 clauses 2e, 3, 9 and 10:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>2. New development which would result in the loss of urban greenspace, will not be permitted unless at least one of the following criteria are met:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>e. Where the proposal relates to the loss of indoor or outdoor sports provision, and there is no evidence of future or continuing need for sports use, or alternatively only land incapable of forming a playing pitch or sporting facility is affected and its release accords with either clause 2a or 2b.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>3. Irrespective of whether criteria in 2. are met, unless the benefits of a proposal clearly outweigh the loss of urban greenspace, development will be resisted where it would result in significantly harm to one or more of the following existing or potential special qualities of greenspace;</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>a. Visual amenity;</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>b. Residential amenity;</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>c. Biodiversity and environmental benefits;</td>
</tr>
<tr>
<td>Ref</td>
<td>Page</td>
<td>Policy/Paragraph</td>
<td>Main Modification</td>
</tr>
<tr>
<td>------</td>
<td>------</td>
<td>------------------</td>
<td>-------------------</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>d. Historical, cultural or community value;</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>e. Recreational benefits; or,</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>f. Physical and /or visual linkages between adjoining urban greenspaces.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>Local Green Spaces</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>9. Any Local Green Spaces Designations (as referred to in the National Planning Policy Framework) which are formally designated will be identified in the Local Plan: Site Allocations and Development Policies or future Neighbourhood Plans (if applicable). This designation will only be used where the greenspace concerned is:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>a. Reasonably close to the community it serves;</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>b. Demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife; and</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>c. Local in character and not an extensive tract of land.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td><strong>Enhancement of Natural and Semi-Natural Greenspace and Tree Protection</strong></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>10. The Council will require encourage proposals for new development to incorporate:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>a. Retention of existing trees, woodland, vegetation and other habitat features which offer a positive contribution to the local environment in terms of visual amenity, recreation value or biodiversity/wildlife interest;</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>b. Appropriate planting of trees, other soft landscaping and installation of habitat features for the benefit of biodiversity; and</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>c. Adequate replacement provision where tree loss is unavoidable, comprising two additional trees for every tree lost and taking account of species and size.</td>
</tr>
<tr>
<td>MM30</td>
<td>133-134</td>
<td>Policy CS 22</td>
<td>Delete Clause 3-5, 7 and 10, and renumber remaining clauses:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>3. New residential development granted permission between the dates set out below will be encouraged to meet the following Code for Sustainable Homes levels (including aspects of the Code standards which are not covered by Building Regulations):</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>a. Between 2013 and 2016 — Level 4; and</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>b. After 2016 — Level 5 (equating to &quot;zero carbon&quot; development).</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>4. New non-residential development granted permission between the dates set out below will be encouraged to meet the following Building Research Establishments Environmental Assessment Methodology (BREEAM) ratings (including aspects of the ratings which are not covered by Building Regulations):</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>a. Up to 2019 — &quot;Very good&quot;; and</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>b. After 2019 — &quot;Excellent&quot;.</td>
</tr>
</tbody>
</table>
|      |      |                  | 5. Relaxations to the standards set out in 3 and 4 above may be
<table>
<thead>
<tr>
<th>Ref</th>
<th>Page</th>
<th>Policy/Paragraph</th>
<th>Main Modification</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>allowed where the applicant demonstrates it is not feasible to meet the prescribed standards.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>7. Where technically feasible and economically viable, major development proposals will be required to include decentralised renewable and low carbon energy systems.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>10. Developers must demonstrate compliance with the requirements of this policy through documents submitted with planning applications. Further details on all the requirements, including the charging mechanism for the Community Energy Fund, will be outlined in the Sustainability in Design and Construction Supplementary Planning Document, Developer Contributions Supplementary Planning Document and/or Community Infrastructure Levy Charging Schedule.</td>
</tr>
<tr>
<td>MM31</td>
<td>135-136</td>
<td>Paragraph 9.7-9.9</td>
<td>Delete paragraphs 9.7-9.9 and add new paragraph 9.7A:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>9.7 While the Council acknowledges that improvements in construction quality and energy efficiency will be made through proposed updates to the Building Regulations, it is considered appropriate that developers should also consider the need for wider sustainable development measures. Therefore, Policy CS 22 encourages new developments to meet sustainable design and construction targets, expressed in the context of the Code for Sustainable Homes for residential development, and Building Research Establishments Environmental Assessment Methodology (BREEAM) ratings for other types of development. These nationally recognised standards encourage new developments to achieve high standards of environmental performance which: minimise levels of energy and water consumption; minimise the environmental impact arising from generation of waste, surface water run-off, and pollution; encourage the use of recycled materials and sustainable construction management; and minimise impacts on ecology and occupant health and wellbeing.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>9.8 The elements of the national standards outlined in Policy CS 22 which relate to energy efficiency are consistent with standards which will be required by proposed revisions to Buildings Regulations (Part L) in 2013, 2016 and 2019. Developers will be required to comply with the Building Regulations as a minimum. The Council also wishes to encourage developers to meet those aspects of the Code for Sustainable Homes and BREEAM standards which do not relate to energy use, and are therefore excluded from the currently proposed changes to the Building Regulations. Policy CS 22 will complement future updates to the Building Regulations and be consistent with the Council’s powers under the Climate Change Act. If the Code for Sustainable Homes or BREEAM are replaced by other national assessment methods, Policy CS 22 will encourage development to meet the new equivalent standards.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>9.9 To increase the level of renewable and low carbon energy generated, national policy allows, where viability can be demonstrated, the setting of phased authority-wide targets for</td>
</tr>
<tr>
<td>Ref</td>
<td>Page</td>
<td>Policy/Paragraph</td>
<td>Main Modification</td>
</tr>
<tr>
<td>-----</td>
<td>------</td>
<td>------------------</td>
<td>-------------------</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>the reduction of carbon emissions. At present, the Council assumes that the changes to Building Regulations will proceed as planned. If there is a significant change in the direction of government policy the Council may seek to implement a local and/or location specific target(s) for carbon reduction.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>9.7A The Government launched a ‘Housing Standards Review’ consultation in August 2013 which sought views on ways to reduce the degree of variation in housing design guidance, codes and standards at the local level. Many of these design aspects are expected to be covered by future updates to Building Regulations. Depending on the detail of these changes the Council will either completely rely on Building Regulations to deliver sustainable design or (where compatible with the Government’s approach) consider the need for some aspects to be defined by local policies in the Local Plan: Site Allocations and Development Policies. Any local policies which are developed are likely to relate to aspects of design which are not covered by the Building Regulations.</td>
</tr>
<tr>
<td>MM32</td>
<td>139</td>
<td>Paragraph 9.19</td>
<td><strong>Amend paragraph 9.19:</strong> 9.19 Policy CS 23 will apply to all types of renewable and low carbon technology, with the exception of wind turbines. Policies relating to the development of wind turbines will be included within the Local Plan: Site Allocations and Development Policies document. Before adoption of that document, wind turbine proposals will be considered against relevant national policy including the Government’s Written Ministerial Statement on this issue, made on 18 June 2015. The Written Ministerial Statement advises that local planning authorities should only grant planning permission for proposals including one or more wind turbines if: the proposed development site is in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan; and, following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.</td>
</tr>
<tr>
<td>MM33</td>
<td>143</td>
<td>Policy CS 25</td>
<td><strong>Amend Policy CS 25 clause 2:</strong> 2. Minerals Safeguarding Areas (“MSAs”) for viable mineral deposits considered to be of current or future economic importance mineral resources of national and local importance will be identified in the Local Plan: Site Allocations and Development Policies and shown on the Proposals Policies Map. The purpose of such MSAs will be to ensure that such resources are not needlessly sterilised by non-mineral development whilst not creating a presumption that resources defined will be worked.</td>
</tr>
<tr>
<td>MM34</td>
<td>144</td>
<td>Paragraph 9.30</td>
<td><strong>Insert after paragraph 9.30 new paragraph 9.30A:</strong> 9.30A A Local Aggregates Assessment (2013) has been prepared for the Greater Manchester, Merseyside, Halton and Warrington area. The LAA indicates that land banks for crushed rock (15.9yrs) and sand and gravel (12.4yrs) in the sub-region</td>
</tr>
<tr>
<td>Ref</td>
<td>Page</td>
<td>Policy/Paragraph</td>
<td>Main Modification</td>
</tr>
<tr>
<td>-----</td>
<td>------</td>
<td>-----------------</td>
<td>------------------</td>
</tr>
<tr>
<td>MM35</td>
<td>151-152</td>
<td>Policy CS 27</td>
<td>Amend Policy CS 27 clauses 2-6 and add new clauses 7-8:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>2. Proposals for new development will be required to demonstrate that any negative impacts of the development may have on the improvement, replacement or provision of new infrastructure will be avoided and/or appropriately mitigated as part of the planning process.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>3. Proposals for new development must have regard to and demonstrate compliance with the Knowsley Infrastructure Delivery Plan, insofar as this is appropriate to the scale and nature of the development.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>4. New development will be expected (where necessary given the scale and nature of the proposal) to:</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>a. Demonstrate compliance with Local Plan policies which specifically require developer contributions, where applicable;</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>b. Provide additional on-site or directly ancillary infrastructure as required to make the specific development acceptable in planning terms. This may include in-kind provision of infrastructure and/or financial contributions; and</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>c. Provide financial contributions towards the provision of strategic infrastructure to support local communities, together with Borough-wide development and other strategic development requirements. Such contributions may be secured through set charges or infrastructure tariffs to be introduced by the Council in other Local Plan documents, Supplementary Planning Documents and/or a Community Infrastructure Levy Charging Schedule, as appropriate.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>5. Plan-level evidence regarding the economic viability of new development in Knowsley will be used to support the setting of any infrastructure charging or tariffs introduced by the Council.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>6. Where legal agreements are to be used to secure site-specific developer contributions in accordance with clause 4 of this policy, these could be subject to site specific negotiations regarding the impacts of the contributions on the economic viability of new development, where the policy permits this as an option. Where a developer believes that meeting policy requirements in relation to developer contributions would place</td>
</tr>
</tbody>
</table>
development at risk, the developer will be required to submit development-specific economic viability evidence to support this position. Such evidence must clearly account for site-specific circumstances and costs and must be undertaken objectively and transparently, in order that it can be scrutinised by the Council. The developer will also be required to provide funds for the independent scrutiny of any viability evidence submitted to the Council. Further guidance about the Council's approach to such negotiations will be provided in the Local Plan: Site Allocations and Development Policies document or a Supplementary Planning Document.

7. Where the Council is satisfied that viability evidence demonstrates that a developer is unable to fully fund all of the developer contributions sought, the Council will make a balanced assessment of whether planning permission should still be granted notwithstanding that not all the contributions sought can be fully provided. In such cases contributions sought will be prioritised in the following order having regard to the advice in table 10.2:

a) Firstly, contributions which are essential for public safety or to achieve a minimum acceptable level of design quality;

b) Secondly, developer contributions which are necessary to address a local infrastructure requirement or deficiency that would be caused or exacerbated by the development;

c) Thirdly, any remaining developer contributions except for those in clause d) below;

d) Finally, those contributions which have the status of being "encouraged" by the Council's planning policies.

8. Further guidance about the Council's approach will be provided in the Local Plan: Site Allocations and Development Policies document and a Supplementary Planning Document.

<table>
<thead>
<tr>
<th>Ref</th>
<th>Page</th>
<th>Policy/Paragraph</th>
<th>Main Modification</th>
</tr>
</thead>
<tbody>
<tr>
<td>MM36</td>
<td>xxxii</td>
<td>n/a</td>
<td>Add new Appendix D set out at end of Appendix.</td>
</tr>
<tr>
<td>MM37</td>
<td>xxxii</td>
<td>n/a</td>
<td>Add new Appendix E set out at end of Appendix.</td>
</tr>
</tbody>
</table>
New Key Diagram (MM3)

Changes

a) Insert additional key notation for "Retail Park" and amendment of existing key notation to "Potential Town Centre Boundary Expansion Area – Kirkby".

b) Change the shading on the Key Diagram in relation to Cables Retail Park (Prescot) from "potential town centre boundary expansion area" to "Retail Park". Retain current designation of this site as part of the Prescot Town Centre Principal Regeneration Area.

c) Retain the "potential town centre boundary expansion area" designation for land on the south side of Kirkby town centre.

d) Change key notation for "locations reserved for urban extension (pre 2028)" to "Sustainable Urban Extensions". Remove numbering (1-10) relating to these locations from the Key Diagram.

e) Colour background below shading of "Sustainable Urban Extensions" and "Locations Safeguarded for Urban Extension (Post 2028)" as white rather than green.
New Housing Trajectory (MM6)

Changes

a) Updates to reflect changes made to the ‘risk assessment’ and phasing of commitments, allocations and SHLAA sites following recommendations from the Inspector in November 2013;

b) Updates to reflect the allocation of Sustainable Urban Extensions

c) To reflect the revised capacity of the Sustainable Urban Extension at Knowsley Lane for new residential development
New Map 6.1 (MM3)

Changes
a) Change key notation for “current urban area (industrial)” to “current urban area (employment)”

b) Minor typographical change to key notation to correct to “Green Belt”.

c) Change key notation for “locations reserved for urban extension (pre 2028)” to “Sustainable Urban Extensions”. Remove numbering relating to these locations from the map.

d) Colour background below shading of “Sustainable Urban Extensions” as white rather than green.

e) Delete the former Christ the King Learning Centre from the map and change the key notation from “Centre for Learning” to “Secondary School”.

New Map 6.2 (MM3)

Changes

a) Change key notation for “current urban area (industrial)” to “current urban area (employment)“.

b) Minor typographical change to key notation to correct to “Green Belt”.

c) Change key notation for “locations reserved for urban extension (pre 2028)” to “Sustainable Urban Extensions”. Remove numbering relating to these locations from the map.

d) Colour background below shading of “Sustainable Urban Extensions” and “Locations Safeguarded for Urban Extension (Post 2028)” as white rather than green.

e) Change the key notation from “Centre for Learning” to “Secondary School”.
Changes

a) Change key notation for “current urban area (industrial)” to “current urban area (employment)”

b) Replace key notation for “potential town centre boundary expansion area” with new notation for “Retail Park” (with revised colour to match this new designation on the Key Diagram).

c) Minor typographical change to key notation to correct to “Green Belt”.

d) Change key notation for “locations reserved for urban extension (pre 2028)” to “Sustainable Urban Extensions”. Remove numbering relating to these locations from the map.

e) Colour background below shading of “Sustainable Urban Extensions” and “Locations Safeguarded for Urban Extension (Post 2028)” as white rather than green.

f) Change the key notation from “Centre for Learning” to “Secondary School”.
New Map 6.4 (MM3)

Changes

a) Change key notation for “current urban area (industrial)” to “current urban area (employment)”.  
b) Minor typographical change to key notation to correct to “Green Belt”.  
c) Change key notation for “locations reserved for urban extension (pre 2028)” to “Sustainable Urban Extensions”. Remove numbering relating to these locations from the map.  
d) Colour background below shading of “Sustainable Urban Extensions” and “Locations Safeguarded for Urban Extension (Post 2028)” as white rather than green.  
e) Change the key notation from “Centre for Learning” to “Secondary School”.  

New Chapter 6A (MM22)

6A SUSTAINABLE URBAN EXTENSIONS AND SAFEGUARDED LAND

6A.1 This chapter builds on earlier chapters by setting out policies for Sustainable Urban Extensions and Safeguarded Land, which include:

- Policy SUE 1 ‘Sustainable Urban Extensions and Safeguarded Land
- Policy SUE 2 ‘Sustainable Urban Extensions – Development Principles’
- Policy SUE 2a ‘Sustainable Urban Extension – Knowsley Lane, Huyton’
- Policy SUE 2b ‘Sustainable Urban Extension – East of Halewood’
- Policy SUE 2c ‘Sustainable Urban Extension – South of Whiston and Land South of M62’

Policy SUE 1: Sustainable Urban Extensions and Safeguarded Land

6A.2 As referred to in policy CS5 and its supporting text, it has been necessary to undertake a review of Green Belt boundaries to identify sufficient land to meet Knowsley’s development needs up to and beyond 2028. To meet these requirements a range of Sustainable Urban Extensions have been removed from the Green Belt. This matter is addressed by Policies SUE 1, SUE 2 and SUE 2a) to 2c).

Policy SUE 1

Sustainable Urban Extensions and Safeguarded Land

1. 9 sites (referred to as Sustainable Urban Extensions) have been removed from the Green Belt and are allocated to provide additional land to meet development requirements up to 2028 and beyond. These sites and their proposed primary uses are listed below:

   a. Bank Lane, Kirkby (residential)
   b. East of Knowsley Industrial and Business Parks, Kirkby (employment)
   c. Knowsley Lane, Huyton (residential and employment)
   d. Edenhurst Avenue, Huyton (residential)
   e. Land bounded by A58, Prescot (residential)
   f. Carr Lane, Prescot (residential)
   g. East of Halewood (residential)
   h. South of Whiston (residential)
   i. Land South of M62 (employment and country park)

2. Land at Knowsley Village has also been removed from the Green Belt but has been identified as “safeguarded land”. This site is not allocated for development at the present time.

3. Revisions to Green Belt boundaries to accommodate the Sustainable Urban Extensions and safeguarded land referred to in sections 1 and 2 above (and which ensure that the revised boundaries in these locations follow clearly defined physical features) are defined by the Policies Map (see Sustainable Urban Extension Allocation Profiles at Appendix E). Any detailed Green Belt boundary changes elsewhere in the Borough will be defined by the Local Plan: Site Allocations and Development Policies.

4. Guidance concerning the development of these locations is set out in policies SUE 2 and 2a) to 2c).

5. Proposals for development in areas falling outside the Sustainable Urban Extensions
defined above and that will remain in the Green Belt shall be subject to the requirements of policy CS5.

<table>
<thead>
<tr>
<th>Core Strategy Policy Links</th>
<th>SD1; CS1 – CS9; CS11 - CS13; SUE 2 - 2c; CS15 - CS27</th>
<th>Strategic Objective Links</th>
<th>SO 1 – SO 3; SO 7; SO 8</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document Links</td>
<td>North Huyton Action Area SPD; Tower Hill (Kirkby) Action Area SPD; other SPDs as appropriate; Monitoring Report</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Delivery Mechanisms</td>
<td>Further detail on policy delivery mechanisms is included at Appendix D.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

6A.3 To ensure a consistent approach to identifying sites for release from the Green Belt, Knowsley and Sefton Councils have undertaken a joint Green Belt study\(^1\) while West Lancashire Borough Council has progressed a Green Belt Study with a similar methodology. These studies aim to ensure that the most appropriate locations are chosen to accommodate development needs. This shared approach ensured that the Local Plans for each of the three districts identify sufficient land for development as required by national policy.

6A.4 The Green Belt Study has been supplemented by the Green Belt Technical Report. This report assessed a range of Green Belt locations identified by the Green Belt Study as having potential for development. Based on a breadth of evidence\(^2\) the report recommends that the most sustainable and appropriate of these locations are released to meet development needs. These locations are referred to as either Sustainable Urban Extensions (SUEs) or Safeguarded Land.

**Development Capacity and Indicative Developable Area**

6A.5 The estimated development capacity of each Sustainable Urban Extension is indicated within their allocation profiles (see Appendix E).

6A.6 There are always uncertainties over the rate at which proposed development locations will be delivered and their ultimate development capacity. The Council has therefore identified sufficient locations to cater for current development requirements identified by the evidence base, including "headroom" to allow a degree of flexibility, which will be subject to ongoing monitoring up to 2028. It also identifies a "safeguarded location" which is likely to be required for development after that date.

6A.7 While the locations identified are the most suitable taking account of the five purposes of including land in the Green Belt, some are also subject to varying degrees of other constraint. These include local designations such as Conservation Areas, Local Wildlife Sites (LWS) and Local Geological Sites (LGS) affecting parts of some locations. Most of the land within the sites is unaffected by flood risk. However, the estimated

---

1A Knowsley and Sefton Green Belt Study – Final Report (Knowsley MBC, 2012)
2A See Section 3 of the Green Belt Technical Report (Knowsley MBC, 2013)
capacity of some of the locations has been adjusted to take account of the extent of Flood Zones 2 and 3 which affect parts of some of the sites. Development outside the indicative developable area and within Flood Zones 2 and 3 will need to satisfy the Exception and/or Sequential Tests depending on the proposed land use for the site in question. Further details on this issue are set out in the Strategic Flood Risk Assessment and in Policy CS 24 ‘Managing Flood Risk’.

6A.8 Detailed assessments and capacities for each location are set out in the evidence base, and further information on the Council’s approach to Green Belt release is set out in the "Green Belt" and "Sustainable Urban Extensions" Technical Reports.

Safeguarded Land

6A.9 The safeguarded land at Knowsley Village is not allocated for development before 2028. Planning permission for development in this location will only be granted following a future review of the Local Plan.

6A.10 The extent of Local Wildlife Site (LWS): 40 Knowsley Park has been amended to reflect updated evidence regarding its ecological value. This LWS lies adjacent to the eastern and southern boundaries of the safeguarded land. This change is reflected on the Policies Map.

Green Belt Boundaries and Policies Map

6A.11 The Sustainable Urban Extensions highlighted in Policy SUE 1 have been removed from the Green Belt and allocated for development. The boundaries of the sites which are included in updates to the Policies Map are contained within the SUE Allocation Profiles (see Appendix E).

6A.12 In addition to the Green Belt Study, the Council has completed a Detailed Green Belt Boundary Review$^{(3A)}$, to identify smaller anomalies in the Green Belt boundary. Detailed boundary changes, where they directly relate to a Sustainable Urban Extension, are incorporated into the new Green Belt boundaries for the Sustainable Urban Extensions and Safeguarded Land on the Policies Map. Detailed boundary changes elsewhere in the borough will be identified by the Local Plan: Site Allocations and Development Policies.

---

3A Knowsley Detailed Green Belt Boundary Review – Version 3 (Knowsley Council, 2014)
Policy SUE 2: Sustainable Urban Extensions - Development Principles

6A.13 Due to the strategic contribution Sustainable Urban Extensions can make to the Local Plan’s objectives it is essential that the release of Sustainable Urban Extensions enables the Council to maintain a consistent rate of housing and employment delivery. It is also important that these areas are developed to a high quality.

6A.14 Policies SUE 2 and 2a - 2c inclusive set out the Council’s expectations regarding how these Sustainable Urban Extensions will be developed.

<table>
<thead>
<tr>
<th>Policy SUE 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sustainable Urban Extensions – Development Principles</td>
</tr>
</tbody>
</table>

**General requirements applicable to all Sustainable Urban Extensions**

1. Development within the Sustainable Urban Extensions must (in no order of priority):
   a. deliver sustainable development;
   b. demonstrate a comprehensive approach to the development of the relevant Sustainable Urban Extension and to infrastructure provision (including, subject to the requirements of policy CS27 'Planning and Paying for Infrastructure', provision of an appropriate proportion of financial and/or "in kind" contributions towards strategic and/or local infrastructure required to enable the comprehensive development of the sites);
   c. be of a high design quality which enhances local distinctiveness and identity (incorporating localised design features where appropriate) and provides high levels of physical and visual integration and connectivity with adjacent urban development (see Policy CS 19 'Design Quality and Accessibility in New Development');
   d. be carried out in accordance with the development principles and using any appropriate development assessment tools as required by Policy CS 2 'Development Principles';
   e. deliver development (including the principal uses defined in Policy SUE 1 'Sustainable Urban Extensions') which will help to meet borough-wide and local needs;
   f. include appropriate provision for public open space (POS), walking and cycling routes as part of the Green Infrastructure network integrating with existing POS, recreational assets and areas of ecological value (see Policy CS 8 'Green Infrastructure' and Policy CS21 'Greenspaces and Trees');
   g. provide good transport linkages within the relevant Sustainable Urban Extension and with surrounding areas (see Policy CS 7 'Transport Networks');
   h. Protect or enhance historic and architectural assets where appropriate (see Policy CS 20 'Managing the Borough’s Historic Environment');
   i. Address flood risk by locating development in areas of low probability of flooding and including flood mitigation measures where necessary (see Policy CS 24 'Flood Risk'); and
   j. Provide a clearly defined edge to the developed area.

**Site Specific Requirements**

2. Indicative considerations applicable to the sustainable development of each SUE are listed at Appendix E ‘Sustainable Urban Extension Allocation Profiles’.

3. For each of the locations referred to in policies SUE 2a) to 2c) (Knowsley Lane, Huyton; East of Halewood; and South of Whiston and Land South of M62), the Council will prepare a Supplementary Planning Document, which will provide a
proposed spatial development framework for the site together with further details of development and infrastructure requirements.

4. Proposals for development within each of these locations will only be granted planning permission where they are consistent with a single detailed master plan for the whole of the Sustainable Urban Extension which is approved by the Council. The master plan should accord with development plan policy and any associated Supplementary Planning Document and may be submitted prior to or with the application. Planning permissions must be linked to any necessary legal agreements for the improvement, provision, management and maintenance of infrastructure, services and facilities, open spaces and other matters necessary to make the development acceptable and which facilitate comprehensive delivery of all phases of development within the Sustainable Urban Extension in accordance with the single detailed master plan.

### Policy Links for SUE 2

<table>
<thead>
<tr>
<th>Core Strategy Policy Links</th>
<th>SD1; CS1 – CS9; CS11 - CS13; SUE1; SUE2a – c; CS15 - CS27</th>
<th>Strategic Objective Links</th>
<th>SO 1 – SO 3; SO 7; SO 8</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document Links</td>
<td>SPDs and Development Briefs as appropriate; Monitoring Report</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Delivery Mechanisms</td>
<td>Further detail on policy delivery mechanisms is included at Appendix D.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Sustainable Development within Sustainable Urban Extensions

6A.15 The Sustainable Urban Extensions in conjunction with urban sites have the potential to deliver the required levels of new development up to 2028. These sites present significant development opportunities and it is essential that a comprehensive approach is taken to their delivery, which maximises their contribution to sustainable development, is of a high design quality and enables an efficient use of infrastructure. New development within the Sustainable Urban Extensions should deliver the principal uses defined in policy SUE1 in a manner which will help meet Borough-wide needs and also take account of any local needs (such as in relation to the mix of housing) in the township or community area within which the site is located.

### Release of Sustainable Urban Extensions

6A.16 To enable housing and employment to be delivered at a consistent rate and to ensure that Knowsley's short term development needs can be met, the Sustainable Urban Extensions are released from the Green Belt on adoption of the Plan. Some employment sites have policy triggers restricting their use to specific target sectors and/or identified needs. The sites are allocated for housing and/or employment development as illustrated on the Policies Map (see Sustainable Urban Extensions and Safeguarded Land Allocation Profiles at Appendix E).

### Master Planning

6A.17 To facilitate the development of the three largest and most complex Sustainable Urban Extensions (at Knowsley Lane, Huyton; East Halewood, and South Whiston and
land south of M62), further policy guidance is provided within Policy SUE 2a) to 2c). The Council is also preparing Supplementary Planning Documents for these sites which will provide further guidance including a spatial development framework for each site.

6A.18 All planning applications within these three Sustainable Urban Extensions should be consistent with a single comprehensive master plan for the site which shows how the principles set out in any Supplementary Planning Document which has been adopted by the Council will be delivered. The master plan for each Sustainable Urban Extension should demonstrate appropriate evidence of stakeholder involvement and consultation and provide a comprehensive phased approach to the development of the Sustainable Urban Extension as a whole. The Council will also require a comprehensive approach to the provision of any developer contributions towards infrastructure requirements required to enable the overall development of these Sustainable Urban Extensions.

6A.19 In the case of the smaller Sustainable Urban Extensions (i.e. those not mentioned in paragraph 6A.17 above) the Council does not intend to prepare Supplementary Planning Documents. Planning applications in these locations will however need to demonstrate a comprehensive approach to delivery of development within the site and to the provision of any necessary infrastructure or developer contributions.

**Further Site-specific Guidance**

6A.20 Further guidance for the development of each SUE is contained within their Allocation Profiles (see Appendix E).
Policy SUE 2a: Sustainable Urban Extension – Knowsley Lane, Huyton

6A.21 The Knowsley Lane, Huyton Sustainable Urban Extension is allocated on land between North Huyton and the M57 to the north. The site is approximately 40 hectares in gross area.

Policy SUE 2a

Sustainable Urban Extension - Knowsley Lane, Huyton

Overall Development Strategy

1. The comprehensive development of Land at Knowsley Lane, Huyton will be supported. The site is allocated for:

   a. New housing development (in the central part of the site) comprising approximately 100 dwellings, to provide a wider choice of housing in conjunction with the wider North Huyton and Stockbridge Village Principal Regeneration Area (see Policy CS 9);

   b. New employment development (in the eastern part of the site) comprising at least 16 hectares of Business Uses (Use Class B1) or other appropriate employment uses within the Liverpool City Region key economic sectors, unless such provision is no longer required based upon evidence of up to date employment land requirements and supply; and

   c. Public open space comprising outdoor sporting provision and associated amenity space in the western part of the site (see Policy CS 21).

2. The employment uses referred to in clause 1b) must be of a nature which would not cause detriment to the amenity of nearby residents. Any employment uses which fall within the definition of town centre uses as defined in policy CS4 must be subject to the application of the sequential and impact tests.

Specific Development Requirements

3. In addition to meeting the generic guidance in Policy SUE 2, development within this site should deliver (in no order of priority):

   a. Appropriate highways access together with a well connected internal road system and traffic mitigation measures;

   b. Gateway enhancement and associated high quality design at the eastern side of the site adjacent to the M57; and

   c. Appropriate interface distances between the mix of uses within the site and to existing residential areas at Knowsley Lane and George Hale Avenue to maintain a good standard of amenity.

4. Further details of these requirements will be set out in the Supplementary Planning Document for this site referred to in policy SUE2.
Policy Links for SUE 2a

<table>
<thead>
<tr>
<th>Core Strategy Policy Links</th>
<th>SD1; CS1 - CS9; SUE 1 - 2; CS15 - CS27</th>
<th>Strategic Objective Links</th>
<th>SO 1 - SO 3; SO 8</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document Links</td>
<td>North Huyton Action Area SPD; Other SPDs as appropriate; Monitoring Report</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Delivery Mechanisms</td>
<td>Further detail on policy delivery mechanisms is included at Appendix D.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Developability and Constraints

6A.22 The Council considers that, based on an assessment of its physical and planning constraints, the land at Knowsley Lane, Huyton has an indicative development capacity of approximately 100 dwellings and 16 hectares of employment land. The area of the site west of George Hale Avenue has been excluded from the developable area as it is used for outdoor sports provision and is required to meet the Council's standards for this use. This area of the site would otherwise be appropriate for housing development.

Neighbouring Regeneration Areas

6A.23 The Knowsley Lane site is on the edge of the North Huyton and Stockbridge Village Principal Regeneration Area, as defined in policy CS9. Due to the high levels of deprivation in North Huyton and Stockbridge Village and the Council's on going commitment to the regeneration of these areas, the development of the Knowsley Lane site will need to complement and effectively integrate with the re-development of these wider areas.

Employment Uses

6A.24 Policy SUE 2a) specifies that at least 16 hectares of the Knowsley Lane site should be reserved for employment uses to provide a sustainable business park environment to supplement the existing provision nearby at Kings Business Park and meet identified sector needs. Development proposals which would lead to employment land provision being below this amount will not be permitted unless it can be demonstrated that such provision is no longer required having regard to the Council’s most up to date Monitoring Report and evidence base. Employment development within the site should be limited to Business uses (within Use Class B1) and other appropriate employment uses within the Liverpool City Region key economic sectors (as listed at Para. 5.27) provided that these are compatible with nearby residential development. Uses within the LCR key economic sectors that are classified as “main town centre uses” will be subject to the sequential and impact tests as appropriate.
Policy SUE 2b: Sustainable Urban Extension – East of Halewood

6A.25 The East of Halewood Sustainable Urban Extension is allocated on two parcels of land to the east of Baileys Lane and Greensbridge Lane. The two sites jointly cover approximately 82 hectares in gross area.

**Policy SUE 2b**

**Sustainable Urban Extension - East of Halewood**

**Overall Development Strategy**

1. The comprehensive development of the land East of Halewood will be supported. The site is allocated for:

   a. New residential development comprising approximately 1,100 dwellings, to provide a wider choice of housing; and
   b. Public open space including flood storage and mitigation measures adjacent to Ditton Brook north of the Liverpool – Manchester railway line. Flood mitigation should be delivered in accordance with Policy CS 24 "Flood Risk" and any future site-specific Flood Risk Assessment.

**Specific Development Requirements**

2. In addition to meeting the generic guidance in Policy SUE 2, proposals for residential development of the land East of Halewood should deliver (in no order of priority):

   a. Safe and convenient highways access for the site together with a well connected internal road system and traffic mitigation measures, including any measures needed to address the impact of the development on traffic generation in the wider area;
   b. Provision for public transport, walking and cycling, which enhance linkages within the area and surrounding areas including linkages to Halewood District Centre, Sports Centre and Railway Station;
   c. Key infrastructure and services to meet needs arising from the site and/or appropriate financial contributions for delivery of required infrastructure off-site.
   d. Appropriate interface distances within the site and to existing residential areas at Baileys Lane, Greensbridge Lane, Aldersgate Drive, and Lower Road to maintain a good standard of amenity

3. Further details of these requirements will be set out in the Supplementary Planning Document for this site referred to in policy SUE2.
Policy Links for SUE 2b

<table>
<thead>
<tr>
<th>Core Strategy Policy Links</th>
<th>Strategic Objective Links</th>
<th>Document Links</th>
<th>Delivery Mechanisms</th>
</tr>
</thead>
<tbody>
<tr>
<td>SD1; CS1 - CS8; SUE 1 - 2; CS15 - CS27</td>
<td>SO 1 - SO 3; SO 8</td>
<td>SPDs as appropriate; Monitoring Report</td>
<td>Further detail on policy delivery mechanisms is included at Appendix D.</td>
</tr>
</tbody>
</table>

Developability and Constraints

6A.26 The "Green Belt" and "Sustainable Urban Extension" Technical Reports assess the physical and planning constraints relating to the East of Halewood Sustainable Urban Extension and identify an indicative development capacity of approximately 1,100 dwellings to be developed up to 2028.

6A.27 An existing RSPCA facility and associated area near the south end of the site (off Higher Road) has been excluded from the developable area as it is not available for development. This area would otherwise be suitable for further housing development. An existing school and associated public open space near the centre of the site is also not currently available for development. Any redevelopment of the site will need to consider local requirements for education and public open space provision as well as meet all the other requirements of a high quality development set out in policies SUE2 and 2b). This must also include appropriate flood risk mitigation measures at the north end of the site adjacent to Ditton Brook, and a comprehensive assessment of all other infrastructure requirements needed to serve the site. A key requirement will be to provide good quality linkages by public transport, walking and cycling to the Halewood district centre and sports centre from the site.
Policy SUE 2c: Sustainable Urban Extensions - South of Whiston and Land South of M62

6A.28 The South Whiston and Land South of M62 Sustainable Urban Extension is allocated on land to either side of the M62 and covers approximately 187 hectares in total gross area. This is the largest Sustainable Urban Extension identified in the Core Strategy.

### Policy SUE 2c

**Sustainable Urban Extension – South of Whiston and Land South of M62**

#### Overall Development Strategy

1. The comprehensive development of Land South of Whiston and Land South of the M62 will be supported. The sites are allocated for:

   a. New housing development (north of the M62) comprising approximately 1,500 dwellings, to provide a wider choice of housing;
   
   b. New employment development (south of the M62) comprising at least 22.5 hectares of logistics, storage and distribution uses (within Use Class B8) or other appropriate employment uses within the Liverpool City Region key economic sectors subject to application of the sequential and impact tests (where required under policy CS4); and
   
   c. A country park within the broad extent of the former Cronton colliery including public open space and the creation of associated footpaths, cycle ways and bridleways.

#### Specific Development Requirements

2. In addition to meeting the generic guidance in Policy SUE 2, proposals for residential and/or employment development at South Whiston and Land South of the M62 should deliver (in no order of priority):

   a. Safe and convenient highways access for the sites together with a well connected internal road system and traffic mitigation measures, including any measures needed to address the impact of the development on traffic generation in the wider area;
   
   b. Provision for public transport, walking and cycling, which enhance linkages within the area and surrounding areas including linkages to the former mineral railway line linking Cronton Colliery and Stadt Moers Park and to Whiston railway station;
   
   c. Public Open Space (POS) within a wider Green Infrastructure network integrating with existing POS, recreational assets, areas of ecological value and the Whiston to Cronton strategic green link (see Policy CS 8 'Green Infrastructure'); and
   
   d. Key infrastructure and services, including consideration of requirements for new local retail provision and a primary school of appropriate scale to meet needs arising from the site, and/or appropriate financial contributions to meet these needs off-site.

3. Further details of these requirements will be set out in the Supplementary Planning Document for this site referred to in policy SUE2
### Policy Links for SUE 2c

<table>
<thead>
<tr>
<th>Core Strategy Policy Links</th>
<th>SD1; CS1 – CS8; SUE 1 – 2; CS15 - CS27</th>
<th>Strategic Objective Links</th>
<th>SO 1 - SO 3; SO 8</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document Links</td>
<td>SPDs as appropriate; Monitoring Report</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Delivery Mechanisms</td>
<td>Further detail on policy delivery mechanisms is included at Appendix D.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Developability and Constraints

**6A.29** The Green Belt and Sustainable Urban Extensions Technical Reports assess the physical and planning constraints affecting the South Whiston and land south of M62 Sustainable Urban Extension. The reports identify an indicative development capacity of approximately 1,500 dwellings at South of Whiston and 22.5 hectares of employment land at Land South of M62. These capacity estimates take account of constraints within the site allocation including Local Wildlife and Geological Sites. The extent of these designations and the findings of up to date ecological assessments will be considered by the master planning process.

**6A.30** The north eastern part of the land South of Whiston includes Fox's Bank Lane Cemetery and a wider area with scope for use as expansion land for the cemetery (part of which already has planning permission for this use). All the cemetery expansion land has currently been excluded from the indicative developable area although the extent of the potential future cemetery expansion will be reviewed in the Council’s proposed Supplementary Planning Document. There may be scope for the indicative dwelling capacity to be increased as a result. The detailed master plan for this Sustainable Urban Extension must also take account of the potential need for off site highway and other transport improvements, additional schooling capacity, local shopping needs and other infrastructure needs connected with a development of this scale on this site.

**6A.31** The Council will support proposals for a Country Park within the broad extent of the former Cronton Colliery, proposals for which should integrate effectively with adjacent employment development and provide good quality public access and permeability.

### Employment Uses

**6A.32** A small area between Windy Arbor Road and Windy Arbor Brow has been excluded from the indicative developable area although may be suitable for employment development. Further details in relation to this issue will be set out in the proposed Supplementary Planning Document.

**6A.33** Policy SUE 2c specifies that at least 22.5 hectares of employment land be provided on land to the South of the M62 as this aligns with the indicative developable area identified as suitable to meet identified sector needs. Delivery of employment land provision above this amount will be supported, where it can be demonstrated that this would contribute to meeting the needs of Liverpool City Region key economic sectors (as identified in Para. 5.27, subject to the application of sequential and impact tests for “main town centre uses” as appropriate) and would be compatible with development of a Country Park within the former colliery. The Council’s proposed Supplementary Planning will consider the implications of mixed uses within this part of the site in further detail.
**APPENDIX D: CORE STRATEGY POLICY DELIVERY MECHANISMS**

This appendix sets out how each policy of the Core Strategy will be delivered, key risks to delivery and how these have been addressed, together with key targets and mechanisms that may trigger remedial measures if a specific policy is not being achieved. Appraisal of the performance of each policy relative to their key targets will be reported annually within the Council’s Monitoring Report.

<table>
<thead>
<tr>
<th>POLICY OF KLPCS</th>
<th>SD 1 Sustainable Development</th>
</tr>
</thead>
</table>
| PRIMARY DELIVERY MECHANISMS | • Development management process  
| | • Influence on other policies, plans and procedures |
| MONITORING INDICATORS (MI) | 111, 112 |
| TARGETS | • National and local targets for applications determined in 8/13 weeks (MI 111) |
| KEY RISKS | • Decision making risks on planning applications  
| | • Policy not reflected in other plans and policies |
| MITIGATION | • Transparent policy approach to inform decision making  
| | • Account for all Local Plan policies in subsequently prepared documents |
| TRIGGERS FOR REMEDIAL ACTION | • Significant decision making delays and/or high rates of appeals being upheld |
| POTENTIAL REMEDIAL ACTIONS | • Review of development management processes and resources |

<table>
<thead>
<tr>
<th>POLICY OF KLPCS</th>
<th>CS 1 Spatial Strategy for Knowsley</th>
</tr>
</thead>
<tbody>
<tr>
<td>PRIMARY DELIVERY MECHANISMS</td>
<td>• Cross cutting policy – see other CS policies</td>
</tr>
<tr>
<td>MONITORING INDICATORS (MI)</td>
<td>1, 4, 18, 21, 23, 38, 39, 41, 44, 49, 54, 64, 65, 67, 69, 70, 97, 106, 113</td>
</tr>
<tr>
<td>TARGETS</td>
<td>• Cross cutting policy – see targets for other CS policies</td>
</tr>
</tbody>
</table>
| KEY RISKS | • The rate of development delivery continues to be lower than targeted due to a slow recovery from recession (see policies CS3, CS4 and CS6)  
| | • Regeneration of the Principal Regeneration Areas is not delivered or only partially delivered (see policies CS9 - CS14)  
| | • Delays in provision of strategic infrastructure |
### Knowsley Local Plan: Core Strategy

**Inspector’s Report, August 2015**

#### MITIGATION
- See policies stated in key risks for specific triggers.
- Engagement with key infrastructure providers in the development of the KLPCS and the Infrastructure Delivery Plan.

#### TRIGGERS FOR REMEDIAL ACTION
- See information on policies stated in "key risks" section above for specific triggers.

#### POTENTIAL REMEDIAL ACTIONS
- Identification of reasons for under delivery and targeted action to address these e.g. release of public sector assets, land assembly, public sector funding support.
- Potential review of Plan.

### POLICY OF KLPCS

#### CS 2 Development Principles

**PRIMARY DELIVERY MECHANISMS**
- Site allocation and development management processes.

**MONITORING INDICATORS (MI)**
- 7, 8, 9, 14, 38, 39, 64, 65, 66, 67, 68, 69, 70, 73, 74, 78, 82, 83, 86, 93, 94, 97, 98, 99, 100, 101, 102, 103, 104, 106, 107, 108, 109, 110, 112, 115

**TARGETS**
- Cross cutting policy – see targets for other CS policies

**KEY RISKS**
- Site allocations and development management decisions need to be based on a balanced assessment of the principles set out in this policy

**MITIGATION**
- Site allocations process will be carefully evidenced to ensure that it takes account of the principles set out here.
- Development management decisions will take account of any of the principles which are relevant to the specific decision

**TRIGGERS FOR REMEDIAL ACTION**
- High rates of appeals being upheld based on specific principles which are set out.

**POTENTIAL REMEDIAL ACTIONS**
- Review of development management processes including weight given to specific principles in decisions.

### POLICY OF KLPCS

#### CS 3 Housing Supply, Delivery and Distribution

**PRIMARY DELIVERY MECHANISMS**
- Delivery of sufficient quantum will be managed in accordance with policy CS3 (clause 3) and reported in the Monitoring Reports and SHLAA updates.
- Investment in private sector and Registered Provider housing (e.g. current Affordable Housing Programme)
- Site allocation and development management processes.
- Partnership working on residential-led regeneration programmes e.g. North Huyton, Tower Hill
<table>
<thead>
<tr>
<th>POLICY OF KLPCS</th>
<th>CS 3 Housing Supply, Delivery and Distribution</th>
</tr>
</thead>
<tbody>
<tr>
<td>MONITORING INDICATORS (MI)</td>
<td>18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 70, 106</td>
</tr>
</tbody>
</table>
| TARGETS | • An average of 450 net dwelling completions per annum between 2010/11 and 2027/28 (MI 19 and MI 20)  
• At least 2250 dwellings deliverable within 5 years (with NPPF buffer) (MI 30 and MI 31)  
• Decreases in empty homes, choice based letting demands, persons registered as homeless and households in fuel poverty (MI 26, 34, 35 and 37)  
• Increase in empty homes brought back into use (MI 27)  
• % new dwellings accessible by public transport, cycle and walking etc. in accordance with the "Ensuring a Choice of Travel" SPD/LTP (MI 70) |
| KEY RISKS | • Economic trends  
• Viability  
• Developer / landowner intentions  
• Land availability assessment  
• Completion rates not meeting required levels over a sustained period, resulting in an overall housing shortfall, and housing need (including affordable housing need) increasing to unsustainable levels.  
• Residents moving out of Knowsley to access appropriate housing elsewhere with knock-on effects such as longer commuting patterns and more traffic, decline in the local economy, and in extreme cases homelessness. |
| MITIGATION | • Buffer or "headroom" of housing development opportunities provided  
• Appropriate risk assessment applied to SHLAA sites  
• Engagement with landowners e.g. call for sites exercises  
• Comprehensive assessment of viability of housing land supply – see Housing Position Statement  
• Viability caveats included in policies CS15 and CS27 |
| TRIGGERS FOR REMEDIAL ACTION | • Persistent and significant under delivery e.g. over a five year period  
• Failure to provide deliverable supply at any one time for 2,250 dwellings plus flexibility as required by NPPF para. 47 |
| POTENTIAL REMEDIAL ACTIONS | • Identification of reasons for under delivery and targeted action to address these e.g. release of public sector assets, land assembly, public sector funding support  
• Review of viability evidence  
• Potential review of Plan |
### Policy of KLPCS

**CS 4 Economy and Employment**

#### Primary Delivery Mechanisms
- Delivery of sufficient quantum of land will be managed in accordance with policy CS4 (clause 4).
- Employment-led Regeneration programmes e.g. Knowsley Industrial and Business Parks
- Economic Regeneration Strategy implementation
- Education, employment and skills programmes
- Access to work assisted by transport schemes e.g. Local Sustainable Transport Fund

#### Monitoring Indicators (MI)
- 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 32, 54, 55, 102, 103, 104, 106

#### Targets
- 9.1 hectares land developed for employment uses per annum (MI 1 and MI 3)
- Appropriate quantitative and qualitative land supply deliverable in five years at any one time (MI 4 and MI 5)
- Increase in numbers and density of businesses, jobs, residents in employment, household income, educational attainment (MI 7, 8, 9, 12, 14, 102 and 103)
- Decrease in numbers of residents on out of work benefits, poverty levels, 16-18 year olds not in education, employment or training (MI 15, 16, 101, 104 and 105)

#### Key Risks
- Economic trends
- Viability
- Developer / landowner intentions
- Land / premises availability assessment
- NPPF paragraphs 22 and 51 pose a risk to this policy if development does not come forward in the short / medium term or if an over-riding local need for housing arises
- Completion rates do not meet required levels, resulting in an overall employment shortfall reducing the economic growth and competitiveness of Knowsley

#### Mitigation
- Buffer of employment sites being provided within supply
- Engagement with landowners, e.g. call for sites exercises
- Spatial distribution of land supply for employment purposes located in areas of proven developer interest for these purposes or accords with evidenced requirements
- Viability caveats included in policy CS27

#### Triggers for Remedial Action
- Persistent and significant under delivery e.g. over a five year period
- Failure to provide a quantitative and qualitative deliverable land supply or adequate range of sites as defined in policy CS4 (clause 4)

#### Potential Remedial Actions
- Identification of reasons for under delivery and targeted action to address these e.g. release of public sector assets, land assembly, public sector funding support
- Potential review of Plan
### POLICY OF KLPCS  
**CS 5 Green Belt**

#### PRIMARY DELIVERY MECHANISMS
- Identification of requirement for Sustainable Urban Extensions (SUEs) to be released from Green Belt linked to requirements of policies CS3 and 4.
- Development management process
- Monitoring and evidence collation

#### MONITORING INDICATORS (MI)
4, 5, 6, 30, 31, 32

#### TARGETS
- Appropriate quantitative and qualitative land supply deliverable in five years at any one time (MI 4 and MI 5)
- At least 2250 dwellings deliverable within 5 years (with NPPF buffer) (MI 30 and MI 31)

#### KEY RISKS
- Pressure for development within unsustainable Green Belt locations to meet identified requirements in Policies CS3 and CS4.
- Risks identified in relation to housing / employment land availability – see above

#### MITIGATION
- Specification of policy criteria which identifies the restrictions on development within the Green Belt
- Identification of specific land supply requirements – policies CS3 and CS4
- Allocations of sites for release which address development requirements via SUE policies.

#### TRIGGERS FOR REMEDIAL ACTION
- Under performance of delivery against requirements and inability to identify a deliverable 5 year land supply assessed according to triggers in policies CS3 and CS4
- High rates of appeals being upheld for proposed development in Green Belt locations (excluding those identified as SUEs).

#### POTENTIAL REMEDIAL ACTIONS
- Potential review of Plan

---

### POLICY OF KLPCS  
**CS 6 Town Centres and Retail Strategy**

#### PRIMARY DELIVERY MECHANISMS
- Site allocation and development management processes
- Current planning permission and proven developer interest for major development in Kirkby town centre
- Lower levels of investment in other centres to be delivered via mainly private sector led investment
- Monitoring and review of evidence

#### MONITORING INDICATORS (MI)
49, 50, 51, 54, 55, 56, 57, 58, 106
### POLICY OF KLPCS CS 6 Town Centres and Retail Strategy

#### TARGETS
- Indicative distribution and phasing of comparison retail provision – see tables 5.3 and 5.4 of KLPCS (MI49, MI54 and MI55)
- Indicative distribution of convenience retail provision – see table 5.5 of the KLPCS (MI49, MI54 and MI55)
- Decrease in levels of vacant retail units in centres (MI 56)
- Increase in retail expenditure retention and footfall in town centres (MI 51, 57 and 58)

#### KEY RISKS
- Economic trends
- Viability
- Developer / landowner intentions
- Completion rates never meet required levels, resulting in an overall shortfall in the quantity and range of retail and service provision in Knowsley’s town centres thereby undermining their performance in meeting local needs.
- No alternative to locate significant retail development in Knowsley other than in town centres, whilst appropriately addressing local needs.

#### MITIGATION
- Comprehensive engagement with developers / landowners
- Site deliverability / viability issues have influenced distribution of capacity proposed

#### TRIGGERS FOR REMEDIAL ACTION
- Persistent and significant under delivery of retail development, e.g. over a five year period relative to MI49, MI54 and MI55
- Persistent poor performance against MI56 e.g. over a five year period

#### POTENTIAL REMEDIAL ACTIONS
- Identification of reasons for under delivery and targeted action to address these, e.g. release of public sector assets, land assembly, public sector funding support
- Potential review of Plan

---

### POLICY OF KLPCS CS 7 Transport Networks

#### PRIMARY DELIVERY MECHANISMS
- Range of funding programmes available e.g. connected to Local Transport Plan to assist delivery of clauses 1 and 3
- Clause 2 and 4 of policy to be primarily delivered via development management and developer contributions processes
- Other policies, procedures and plans

#### MONITORING INDICATORS (MI)
**POLICY OF KLPCS**  

**CS 7 Transport Networks**

<table>
<thead>
<tr>
<th>TARGETS</th>
</tr>
</thead>
</table>
| Delivery of transport schemes in Knowsley etc. in accordance with the LTP (MI 64)  
| % new dwellings accessible by public transport, cycle and walking etc. in accordance with the "Ensuring a Choice of Travel" SPD/LTP (MI 70)  
| Maintain number of Air Quality Management Areas at zero (MI 82)  
| Decrease in transport emissions, number of noise complaints and number of people killed/seriously injured in traffic accidents (MI 83 and MI 110)  
| Delivery of major infrastructure schemes as set out in the Infrastructure Delivery Plan (MI 115)  

<table>
<thead>
<tr>
<th>KEY RISKS</th>
</tr>
</thead>
</table>
| Funding of transport schemes where this has not already been committed  
| Ability to access capital funding to deliver larger infrastructure projects  
| Withdrawal of existing services could worsen accessibility by sustainable modes of travel  
| Economic conditions and market-led nature of some public transport provision  

<table>
<thead>
<tr>
<th>MITIGATION</th>
</tr>
</thead>
</table>
| Joint working on monitoring of Local Plan, LTP and IDP  
| Submission of funding bids as required  
| Local strategies for community transport  

<table>
<thead>
<tr>
<th>TRIGGERS FOR REMEDIAL ACTION</th>
</tr>
</thead>
</table>
| Non delivery of major infrastructure required to facilitate the delivery of the strategy  
| Persistent and significant poor or declining performance against target indicators  

<table>
<thead>
<tr>
<th>POTENTIAL REMEDIAL ACTIONS</th>
</tr>
</thead>
</table>
| Targeted action to support infrastructure delivery e.g. release of public sector assets, land assembly, public sector funding support  
| Potential review of Plan  
| Regular monitoring and review of evidence  

**POLICY OF KLPCS**  

**CS 8 Green Infrastructure**

<table>
<thead>
<tr>
<th>PRIMARY DELIVERY MECHANISMS</th>
</tr>
</thead>
</table>
| Site allocation and development management processes.  
| Public sector investment to support the priorities within the Knowsley Green Space Strategy, Liverpool City Region Green Infrastructure Framework and Mersey Forest Plan, as supported by evidence in the Greenspace Audit and Playing Pitch Assessment and Strategy.  
| Assistance from funding for sustainable transport schemes e.g. Local Sustainable Transport Fund  
| Developer contributions  

<table>
<thead>
<tr>
<th>MONITORING INDICATORS (MI)</th>
</tr>
</thead>
</table>
| 64, 65, 75, 76, 84, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 106, 108, 109  

### POLICY OF KLPCS

<table>
<thead>
<tr>
<th>CS 8 Green Infrastructure</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>TARGETS</strong></td>
</tr>
<tr>
<td>- Delivery of transport schemes in Knowsley etc. in accordance with the LTP (MI 64)</td>
</tr>
<tr>
<td>- Increase river water quality and resident satisfaction with parks (MI 84 and MI 90)</td>
</tr>
<tr>
<td>- Performance against quantitative standards set in tables 8.1 and 8.2 of KLPCS (MI86 and MI87)</td>
</tr>
<tr>
<td>- Maintain or increase percentage of open space considered to be of good excellent quality etc. (MI 88)</td>
</tr>
<tr>
<td><strong>KEY RISKS</strong></td>
</tr>
<tr>
<td>- Variable provision across the Borough</td>
</tr>
<tr>
<td>- Funding availability where this has not already been committed.</td>
</tr>
<tr>
<td>- Pressure from development needs for housing and employment upon environmental and ecologically sensitive sites.</td>
</tr>
<tr>
<td>- Reduced public sector resources available to deliver priorities.</td>
</tr>
<tr>
<td><strong>MITIGATION</strong></td>
</tr>
<tr>
<td>- Partnership working and consistency of priorities with Knowsley Greenspaces Strategy and Playing Pitch Assessment, Knowsley Green Space Strategy, Liverpool City Region Green Infrastructure Framework and Mersey Forest Plan to address specific areas of weakness, deficits and shortfalls</td>
</tr>
<tr>
<td>- Submission of funding bids as required</td>
</tr>
<tr>
<td>- Continue to liaise with sites owners to encourage greater management of ecologically important areas.</td>
</tr>
<tr>
<td>- Preparation of additional Local Plan documents and supplementary guidance.</td>
</tr>
<tr>
<td><strong>TRIGGERS FOR REMEDIAL ACTION</strong></td>
</tr>
<tr>
<td>- Persistent poor or declining performance against target indicators (MI86, MI87 and MI88).</td>
</tr>
<tr>
<td>- Future Greenspace Audit or Playing Pitch Assessment could potentially find revisions to standards needed</td>
</tr>
<tr>
<td><strong>POTENTIAL REMEDIAL ACTIONS</strong></td>
</tr>
<tr>
<td>- Targeted improvements to be included as investment priorities in the review of Knowsley’s Green Space Strategy.</td>
</tr>
<tr>
<td>- Future review of standards through review of Local Plan.</td>
</tr>
</tbody>
</table>

### POLICY OF KLPCS

<table>
<thead>
<tr>
<th>CS 9 Principal Regeneration Area – North Huyton and Stockbridge Village</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PRIMARY DELIVERY MECHANISMS</strong></td>
</tr>
<tr>
<td>- Site allocation, master planning and development management processes</td>
</tr>
<tr>
<td>- Current planning permission and proven developer interest demonstrated by ongoing development</td>
</tr>
<tr>
<td>- Public and private sector investment</td>
</tr>
<tr>
<td>- Developer contributions</td>
</tr>
<tr>
<td><strong>MONITORING INDICATORS (MI)</strong></td>
</tr>
<tr>
<td>19, 30, 40, 41, 42, 43, 50</td>
</tr>
<tr>
<td><strong>TARGETS</strong></td>
</tr>
<tr>
<td>- Policy sets out guidance on mix of development in this area to include at least 1,450 dwellings (see paragraph 6.12 of KLPCS)</td>
</tr>
<tr>
<td>- Contribution to achieving annual housing targets in MI19, and identification of housing land supply in MI30.</td>
</tr>
<tr>
<td>POLICY OF KLPCS</td>
</tr>
<tr>
<td>-----------------</td>
</tr>
</tbody>
</table>
| KEY RISKS       | • Economic trends  
|                 | • Viability  
|                 | • Developer / landowner intentions  
|                 | • Non-delivery of housing development as the catalyst to meeting wider regeneration and development needs, including for affordable housing  |
| MITIGATION      | • Potential transfer or release of remaining public sector assets  
|                 | • Comprehensive engagement with developers / landowners  
|                 | • Flexibility for changes in layout, density and capacity relative to existing commitment, including further master planning  
|                 | • Viability caveats included in policy CS27  |
| TRIGGERS FOR REMEDIAL ACTION | • Evidence of links to persistent and significant under delivery and under performance e.g. over a five year period, against MI49, MI54 and MI55.  |
| POTENTIAL REMEDIAL ACTIONS | • Identification of reasons for under delivery and targeted action to address these e.g. release of public sector assets, land assembly, public sector funding support  
|                               | • Potential review of policy approach within Local Plan: Site Allocations and Development Policies  
|                               | • Provision of additional policy guidance within updated Supplementary Planning Document  
|                               | • Potential review of Plan  |

<table>
<thead>
<tr>
<th>POLICY OF KLPCS</th>
<th>CS 10 Principal Regeneration Area – Kirkby Town Centre</th>
</tr>
</thead>
</table>
| PRIMARY DELIVERY MECHANISMS | • Site allocation and development management processes  
|                               | • Current planning permission and proven developer interest for major development in Kirkby town centre  
|                               | • Public and private sector investment.  
|                               | • Developer contributions  |
| MONITORING INDICATORS (MI) | 4, 40, 49, 50, 51, 54, 55, 56 57, 58  |
| TARGETS | • Policy sets out guidance on mix of development in this area  
|         | • Indicative amount and phasing of new comparison retail floorspace to be as set out in tables 5.3 and 5.4 of the KLPCS  
|         | • Indicative amount of new convenience retail floorspace to be as set out in table 5.5 of the KLPCS  
|         | • Increased retail expenditure retention and footfall (MI 51 and 57)  
|         | • Proportion of vacant retail units within Kirkby Town Centre (MI56)  |
**POLICY OF KLPCS** 

<table>
<thead>
<tr>
<th>CS 10 Principal Regeneration Area – Kirkby Town Centre</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>KEY RISKS</strong></td>
</tr>
<tr>
<td>• Economic trends</td>
</tr>
<tr>
<td>• Viability</td>
</tr>
<tr>
<td>• Developer/ landowner intentions</td>
</tr>
<tr>
<td>• Non-delivery of retail development as the catalyst to meeting wider regeneration needs</td>
</tr>
<tr>
<td>• There is no alternative for large scale retail investment in Kirkby, or to locate such a town centre development elsewhere in the Borough</td>
</tr>
<tr>
<td><strong>MITIGATION</strong></td>
</tr>
<tr>
<td>• Comprehensive engagement with developers / landowners</td>
</tr>
<tr>
<td>• Site deliverability / viability issues have influenced distribution of development</td>
</tr>
<tr>
<td>• Flexibility for alternative approaches to the existing commitment if required</td>
</tr>
<tr>
<td>• Viability caveats included in policy CS27</td>
</tr>
<tr>
<td><strong>TRIGGERS FOR REMEDIAL ACTION</strong></td>
</tr>
<tr>
<td>• Evidence of links to persistent and significant under delivery of retail e.g. over a five year period, against MI49, MI54 and MI55.</td>
</tr>
<tr>
<td>• Persistent poor performance of Kirkby Town Centre against MI56.</td>
</tr>
<tr>
<td><strong>POTENTIAL REMEDIAL ACTIONS</strong></td>
</tr>
<tr>
<td>• Identification of reasons for under delivery and targeted action to address these e.g. release of public sector assets, land assembly, public sector funding support.</td>
</tr>
<tr>
<td>• Potential review of policy approach within Local Plan: Site Allocations and Development Policies</td>
</tr>
<tr>
<td>• Provision of additional policy guidance within Supplementary Planning Document</td>
</tr>
<tr>
<td>• Potential review of Plan</td>
</tr>
</tbody>
</table>

**POLICY OF KLPCS** 

<table>
<thead>
<tr>
<th>CS 11 Principal Regeneration Area: Knowsley Industrial and Business Parks</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PRIMARY DELIVERY MECHANISMS</strong></td>
</tr>
<tr>
<td>• Site allocations and development management processes</td>
</tr>
<tr>
<td>• Current planning permission and proven developer interest demonstrated by historic and ongoing development</td>
</tr>
<tr>
<td>• Public and private sector investment</td>
</tr>
<tr>
<td>• Developer contributions and Local Development Orders</td>
</tr>
<tr>
<td><strong>MONITORING INDICATORS (MI)</strong></td>
</tr>
<tr>
<td>1, 3, 4, 40, 44, 45, 46, 47, 48, 50, 79, 80, 81</td>
</tr>
<tr>
<td><strong>TARGETS</strong></td>
</tr>
<tr>
<td>• Policy sets out guidance on mix of development in this area and priorities for employment development.</td>
</tr>
<tr>
<td>• Contribution to achieving annual employment targets in MI 1 and MI 3.</td>
</tr>
<tr>
<td><strong>KEY RISKS</strong></td>
</tr>
<tr>
<td>• Economic trends</td>
</tr>
<tr>
<td>• Viability</td>
</tr>
<tr>
<td>• Developer/ landowner intentions</td>
</tr>
<tr>
<td>• Land/premises availability assessment</td>
</tr>
</tbody>
</table>
## POLICY OF KLPCS CS 11 Principal Regeneration Area: Knowsley Industrial and Business Parks

### MITIGATION
- Buffer of employment sites being provided
- Engagement with landowners e.g. call for sites exercises
- Viability caveats included in policy CS27

### TRIGGERS FOR REMEDIAL ACTION
- Evidence of links to persistent and significant under delivery and under performance e.g. over a five year period, against MI 1, MI 3 relative to MI44 and MI46.

### POTENTIAL REMEDIAL ACTIONS
- Identification of reasons for under delivery and targeted action to address these e.g. release of public sector assets, land assembly, public sector funding support
- Potential review of policy approach within Local Plan: Site Allocations and Development Policies
- Provision of additional policy guidance within Supplementary Planning Document
- Potential review of Plan

## POLICY OF KLPCS CS 12 Principal Regeneration Area – Tower Hill

### PRIMARY DELIVERY MECHANISMS
- Council’s land disposal programme
- Site allocation, master planning and development management processes
- Public and private sector investment.
- Developer contributions.

### MONITORING INDICATORS (MI) 4, 19, 40, 41, 42, 43, 49, 50

### TARGETS
- Policy sets out guidance on mix of development in this area which is to include at least 300 dwellings (see paragraph 6.35 of KLPCS)
- Contribution to achieving annual housing targets in MI19, and identification of housing land supply in MI30.

### KEY RISKS
- Economic trends
- Viability
- Developer / landowner intentions

### MITIGATION
- Ongoing release of public sector assets
- Comprehensive engagement with potential developers
- Flexibility for layout, density and capacity relative to further master planning
- Viability caveats included in policy CS27

### TRIGGERS FOR REMEDIAL ACTION
- Evidence of links to persistent and significant under delivery and under performance e.g. over a five year period, against MI49, MI54 and MI55.
<table>
<thead>
<tr>
<th>POLICY OF KLPcs</th>
<th>CS 12 Principal Regeneration Area – Tower Hill</th>
</tr>
</thead>
</table>
| POTENTIAL REMEDIAL ACTIONS | • Identification of reasons for under delivery and targeted action to address these e.g. release of public sector assets, land assembly, public sector funding support.  
• Potential review of policy approach within Local Plan: Site Allocations and Development Policies  
• Provision of additional policy guidance within updated Supplementary Planning Document  
• Potential review of Plan |

<table>
<thead>
<tr>
<th>POLICY OF KLPcs</th>
<th>CS 13 Principal Regeneration Area – South Prescot</th>
</tr>
</thead>
</table>
| PRIMARY DELIVERY MECHANISMS | • Site allocation, master planning and development management processes  
• Current planning permission and proven interest for development in South Prescot.  
• Private sector investment.  
• Developer contributions. |
| MONITORING INDICATORS (MI) | 1, 3, 4, 19, 40, 41, 42, 43, 44, 45, 46, 50 |
| TARGETS | • Policy sets out guidance on mix of development in this area  
• Contribution to achieving annual employment targets in MI 1 and MI 3, and / or housing targets in MI19 and identification of housing land supply in MI30. |
| KEY RISKS | • Economic trends  
• Viability  
• Developer / landowner intentions |
| MITIGATION | • Engagement with landowners e.g. call for sites exercises  
• Planned flexibility for either housing or employment development  
• Necessary headroom in strategy to account for loss of employment land  
• Site deliverability / viability issues have influenced distribution of development  
• Viability caveats included in policy CS27 |
| TRIGGERS FOR REMEDIAL ACTION | • Evidence of links to persistent and significant under delivery and under performance e.g. over a five year period, against MI1, MI3 and / or MI19, via MI40 – MI46. |
| POTENTIAL REMEDIAL ACTIONS | • Identification of reasons for under delivery and targeted action to address these e.g. release of public sector assets, land assembly, public sector funding support  
• Potential review of policy approach within Local Plan: Site Allocations and Development Policies  
• Provision of additional policy guidance within Supplementary Planning Document  
• Potential review of Plan |
<table>
<thead>
<tr>
<th>POLICY OF KLPCS</th>
<th>CS 14 Principal Regeneration Area – Prescot Town Centre</th>
</tr>
</thead>
</table>
| **PRIMARY DELIVERY MECHANISMS** | • Site allocation, master planning and development management processes.  
• Current planning permission on Sewell Street.  
• Public and private sector investment.  
• Developer contributions.  
• Prescot Townscape Heritage Initiative  
• Prescot Town Centre Conservation Area Character Appraisal and Management Plan |
| **MONITORING INDICATORS (MI)** | 4, 40, 49, 51, 52, 53, 54, 55, 56, 57 |
| **TARGETS** | • Policy sets out guidance on mix of development in this area  
• Indicative amount and phasing of new comparison retail floorspace to be as set out in tables 5.3 and 5.4 of the KLPCS  
• Increased retail expenditure retention and footfall (MI 51 and 57)  
• Proportion of vacant retail units within Prescot Town Centre (MI56) |
| **KEY RISKS** | • Economic trends  
• Viability  
• Developer/ landowner intentions  
• Non-delivery of retail development as the catalyst to meeting wider regeneration needs  
• Prescot Town Centre Conservation Area continues to be included on the English Heritage ‘at risk’ register |
| **MITIGATION** | • Policy emphasis upon improvements to Prescot Town Centre (including Prescot Conservation Area)  
• Engagement with landowners e.g. call for sites exercises  
• Site deliverability / viability issues have influenced distribution of development  
• Flexibility for alternative approaches to the existing commitment if required  
• Viability caveats included in policy CS27 |
| **TRIGGERS FOR REMEDIAL ACTION** | • Evidence of links to persistent and significant under delivery of retail e.g. over a five year period, against MI49, MI54 and MI55  
• Persistent poor performance of Prescot Town Centre against MI56 |
| **POTENTIAL REMEDIAL ACTIONS** | • Identification of reasons for under delivery and targeted action to address these e.g. release of public sector assets, land assembly, public sector funding support  
• Potential review of policy approach within Local Plan: Site Allocations and Development Policies  
• Provision of additional policy guidance within Supplementary Planning Document  
• Potential review of Plan |
<table>
<thead>
<tr>
<th>POLICY OF KLPCS</th>
<th>SUE 1 Sustainable Urban Extensions and Safeguarded Land</th>
</tr>
</thead>
</table>
| **PRIMARY DELIVERY MECHANISMS** | - Allocations of sites for release from Green Belt linked to requirements of policies CS3 and 4.  
  - Allocation of further land as safeguarded land for post 2028 needs, unless required to address 5 year land supply assessed according to triggers in policies CS3 and 4.  
  - Master planning  
  - Development management process  
  - Monitoring and evidence collation |
| **MONITORING INDICATORS (MI)** | 4, 5, 6, 30, 31, 32 |
| **TARGETS** | - Appropriate quantitative and qualitative land supply deliverable in five years at any one time (MI 4 and MI 5)  
  - At least 2250 dwellings deliverable within 5 years (with NPPF buffer)(MI 30 and MI 31) |
| **KEY RISKS** | - Risks identified in relation to housing / employment land availability – see Policies CS3 and 4.  
  - Developer / landowner intentions  
  - Encourage proposals for less sustainable forms of development, within SUEs and in other Green Belt locations. |
| **MITIGATION** | - Immediate allocation of sites for release from Green Belt  
  - Indication of preferred land use  
  - Engagement with landowners  
  - Requirement for master planning – see other SUE policies  
  - Clarification that areas falling outside of SUEs remain in the Green Belt and are subject to the requirements of Policy CS5 |
| **TRIGGERS FOR REMEDIAL ACTION** | - Under performance of delivery against requirements and inability to identify a deliverable 5 year land supply assessed according to triggers in policies CS3 and CS4 |
| **POTENTIAL REMEDIAL ACTIONS** | - Potential review of Plan |

<table>
<thead>
<tr>
<th>POLICY OF KLPCS</th>
<th>SUE 2 Sustainable Urban Extensions – development principles</th>
</tr>
</thead>
</table>
| **PRIMARY DELIVERY MECHANISMS** | - Cross cutting criteria policy relating to expectations of SUEs, with links to CS2, CS7, CS8, CS19, CS20 and CS21  
  - Master planning  
  - Development management process  
  - Developer contributions  
  - Monitoring and evidence collation |
| **MONITORING INDICATORS (MI)** | 7, 8, 9, 14, 38, 39, 64, 65, 66, 67, 68, 69, 70, 73, 74, 78, 82, 83, 86, 93, 94, 97, 98, 99, 100, 101, 102, 103, 104, 106, 107, 108, 109, 110, 112, 115 |
| **TARGETS** | - Cross cutting policy – see targets for other CS policies |
### Key Risks
- Development management decisions need to be based on a balanced assessment of the principles set out in this policy
- Less sustainable forms of development in SUEs
- Economic trends
- Viability
- Developer / landowner intentions

### Mitigation
- Policy criteria indicate specific development expectations
- Requirement for master planning on large sites
- Viability caveats included in policy CS27

### Triggers for Remedial Action
- High rates of appeals being upheld based on specific principles which are set out.

### Potential Remedial Actions
- Review of development management processes including weight given to specific principles in decisions.

---

<table>
<thead>
<tr>
<th>Policy of KLPCS</th>
<th>SUE 2a Sustainable Urban Extension – Knowsley Lane, Huyton</th>
</tr>
</thead>
</table>
| **Primary Delivery Mechanisms** | * Allocation of site for development  
* Master planning  
* Private sector investment  
* Development management process  
* Developer contributions |
| **Monitoring Indicators (MI)** | 4, 5, 6, 19, 30, 31, 32, 86, 87 |
| **Targets** | * Policy sets out a mix of development in this area to include approximately 100 dwellings and at least 16 hectares of business use.  
* Contribution to achieving employment land targets in MI4 and identification of employment land supply in MI5  
* Contribution to achieving annual housing targets in MI19, and identification of housing land supply in MI30 |
| **Key Risks** | * Delivery of residential development that does not deliver a wider choice of housing to meet local needs  
* Development not meeting quantitative and qualitative employment requirements.  
* Non-delivery of gateway enhancements  
* Pressure for development on existing public open space  
* Economic trends  
* Viability  
* Developer / landowner intentions |
### MITIGATION

- Policy criteria included to ensure appropriate business uses within the LCR Key Employment Sectors with specific minimum area to address employment requirements.
- Policy criteria requiring gateway enhancements
- Retention of allocation of urban greenspace on western part of site.
- Engagement with developers / landowners
- Requirement for master planning
- Viability caveats included in policy CS27

### TRIGGERS FOR REMEDIAL ACTION

- Evidence of links to persistent and significant under delivery and under performance e.g. over a five year period, against MI14 and MI19.

### POTENTIAL REMEDIAL ACTIONS

- Identification of reasons for under delivery and targeted action to address these e.g. public sector funding support
- Provision of additional policy guidance within Supplementary Planning Document
- Potential review of Plan

---

### POLICY OF KLPCS

**SUE 2b Sustainable Urban Extension – East of Halewood**

#### PRIMARY DELIVERY MECHANISMS

- Allocation of site for development
- Master planning
- Private sector investment
- Development management process
- Developer contributions

#### MONITORING INDICATORS (MI)

19, 30, 31, 32, 75, 86, 87

#### TARGETS

- Policy sets out a mix of development in this area to include approximately 1100 dwellings
- Contribution to achieving annual housing targets in MI19, and identification of housing land supply in MI30

#### KEY RISKS

- Delivery of residential development that does not deliver a wider choice of housing to meet local needs
- Economic trends
- Viability
- Developer / landowner intentions

#### MITIGATION

- Engagement with developers / landowners
- Requirement for master planning
- Viability caveats included in policy CS27

#### TRIGGERS FOR REMEDIAL ACTION

- Evidence of links to persistent and significant under delivery and under performance e.g. over a five year period, against MI19.

#### POTENTIAL REMEDIAL ACTIONS

- Identification of reasons for under delivery and targeted action to address these e.g. public sector funding support.
- Provision of additional policy guidance within updated Supplementary Planning Document
- Potential review of Plan
### POLICY OF KLPSCS

**SUE 2c – Sustainable Urban Extension – south of Whiston and land south of M62**

### PRIMARY DELIVERY MECHANISMS
- Allocation of site for development
- Master planning
- Private sector investment
- Development management process
- Developer contributions

### MONITORING INDICATORS (MI)
- 4, 5, 6, 19, 30, 31, 32, 86, 87

### TARGETS
- Policy sets out a mix of development in this area to include approximately 1500 dwellings, at least 22.5 hectares of employment uses within LCR key employment sectors and a country park.
- Contribution to achieving employment land targets in MI4 and identification of employment land supply in MI5
- Contribution to achieving annual housing targets in MI19, and identification of housing land supply in MI30

### KEY RISKS
- Delivery of residential development that does not deliver a wider choice of housing to meet local needs
- Development not meeting quantitative and qualitative employment requirements.
- Non-delivery of country park
- Pressure for development on existing public open space and Local Wildlife Sites
- Economic trends
- Viability
- Developer / landowner intentions

### MITIGATION
- Policy criteria included to ensure appropriate employment uses within the LCR Key Employment Sectors with specific minimum area to address employment requirements.
- Retention of allocation of existing urban greenspace and Local Wildlife Site designations
- Engagement with developers / landowners
- Requirement for master planning
- Flexibility to account for any future change in land area sought for employment uses and country park on land to south of M62.
- Viability caveats included in policy CS27

### TRIGGERS FOR REMEDIAL ACTION
- Evidence of links to persistent and significant under delivery and under performance e.g. over a five year period, against MI4 and MI19.

### POTENTIAL REMEDIAL ACTIONS
- Identification of reasons for under delivery and targeted action to address these e.g. public sector funding support
- Provision of additional policy guidance within Supplementary Planning Document
- Potential review of Plan
## POLICY OF KLPCS

### CS 15 Delivering Affordable Housing

#### PRIMARY DELIVERY MECHANISMS
- Development management process
- Developer contributions
- Preparation of supplementary guidance and evidence
- Partnership working with Registered Providers

#### MONITORING INDICATORS (MI)
- 22, 23, 24, 26, 27, 33, 34, 35, 36, 113, 114

#### TARGETS
- No specific target for overall amount of affordable housing (MI 22-23) but policy requirements for proportions subject to provisos including viability (MI 24)
- Decrease in empty homes (MI 26)
- Increase in empty homes brought back into use (MI 27)
- Decreases in choice based letting demands, persons registered as homeless and households in fuel poverty (MI 34, MI 35 and MI 37)

#### KEY RISKS
- Affordable housing needs become even more pressing due to the increasing and unmet demand, resulting in overcrowded households.
- Residents moving out of the Knowsley to access affordable housing elsewhere with knock-on effects such as longer commuting patterns and more traffic, decline in the local economy, and, in extreme cases, homelessness.
- Economic trends, meaning viability affects ability to meet the requirements of the policy

#### MITIGATION
- Policy inclusion of flexibility for lower proportions of affordable housing requirements where viability dictates.
- Viability caveats included in policy CS15 and linking to policy CS27
- Viability evidence to be regularly updated.

#### TRIGGERS FOR REMEDIAL ACTION
- A significant and persistent failure by market housing developers to deliver affordable housing
- Revised viability evidence indicates that the percentage sought is no longer viable for all developments

#### POTENTIAL REMEDIAL ACTIONS
- Potential review of percentage stated in policy
- Provision of further or revised supplementary guidance

## POLICY OF KLPCS

### CS 16 Specialist and Supported Accommodation

#### PRIMARY DELIVERY MECHANISMS
- Development management processes
- Council policies, procedures and plans, including Housing Strategy
- Partnership working across public and private sector agencies

#### MONITORING INDICATORS (MI)
- 28

#### TARGETS
- No specific target identified
### POLICY OF KLPCS CS 16 Specialist and Supported Accommodation

#### KEY RISKS
- Lack of cooperation from partners, affecting joint working and preparation of integrated strategies
- Partner, developer and landowner intentions
- Provision of inadequate specialist and supported accommodation if policy is not applied consistently

#### MITIGATION
- Proactive joint working by the Council
- Consider need for more detailed policy guidance for specialist and supported accommodation

#### TRIGGERS FOR REMEDIAL ACTION
- Significant and persistent delivery of unsuitable accommodation
- Emerging evidence indicating a need for more detailed policy guidance

#### POTENTIAL REMEDIAL ACTIONS
- Review policy approach through the Local Plan
- Provision of more detailed policy guidance
- Greater emphasis on joint working with key partners

---

### POLICY OF KLPCS CS 17 Housing Sizes and Design Standards

#### PRIMARY DELIVERY MECHANISMS
- Development management processes
- Developer contributions
- Preparation of supplementary guidance

#### MONITORING INDICATORS (MI)
- 18, 25, 37, 59

#### TARGETS
- Decrease in numbers of households in fuel poverty (MI 37)
- Indicative mix of dwelling sizes on current evidence identified in KLPCS table 7.1 (new evidence will be reviewed as Plan period progresses)

#### KEY RISKS
- Substantial changes to government-endorsed guidance for residential design standards
- Emergence of new evidence which significantly changes the mix of housing sizes required
- Economic trends, affecting development viability and compromising design quality of new residential development

#### MITIGATION
- Policy inclusion of flexibility on meeting design standards and dwelling size mix
- Review of endorsed design standards undertaken regularly and recognition that these may change

#### TRIGGERS FOR REMEDIAL ACTION
- Necessary to reflect radical change to recognised design standards or evidence regarding the delivery required to meet design standards

#### POTENTIAL REMEDIAL ACTIONS
- Review Policy approach through the Local Plan
- Provision of more detailed policy guidance
<table>
<thead>
<tr>
<th>POLICY OF KLPCS</th>
<th>CS 18 Accommodation for Gypsies and Travellers etc.</th>
</tr>
</thead>
</table>
| PRIMARY DELIVERY MECHANISMS | • Development management processes  
• Site allocations process  
• Collation of evidence  
• Public and/or private sector investment  
• Council plans, procedures and plans |
| MONITORING INDICATORS (MI) | 29, 59, 70 |
| TARGETS | • Level of provision will be determined in Local Plan: Site Allocations and Development Policies, including accommodation targets (MI 29).  
• % new dwellings accessible by public transport, cycle and walking etc. in accordance with the "Ensuring a Choice of Travel" SPD/LTP (MI 70) |
| KEY RISKS | • Developer / landowner intentions  
• Difficulties in identifying a site or sites to accommodate accommodation targets  
• Revised evidence indicates requirement to change accommodation targets over the plan period  
• Change in government policy regarding the provision of accommodation for travellers |
| MITIGATION | • Target-setting and site allocations undertaken through Local Plan process, including assessments, consultation and examination  
• Evidence collated on sub-regional basis  
• Regular review of government guidance and policy |
| TRIGGERS FOR REMEDIAL ACTION | • Poor performance against targets (once set), including inability to identify appropriate supply of accommodation |
| POTENTIAL REMEDIAL ACTIONS | • Review targets / allocations through the Local Plan  
• Provision of more detailed policy guidance |

<table>
<thead>
<tr>
<th>POLICY OF KLPCS</th>
<th>CS 19 Design Quality and Accessibility in New Development</th>
</tr>
</thead>
</table>
| PRIMARY DELIVERY MECHANISMS | • Pre application engagement  
• Development management process  
• Master planning process |
| MONITORING INDICATORS (MI) | 37, 90, 105, 106, 112 |
| TARGETS | • Local targets for number of appeals upheld (MI 112)  
• Decrease in numbers of households in fuel poverty and crime levels (MI 37 and MI 105) |
<table>
<thead>
<tr>
<th>POLICY OF KLPCS</th>
<th>CS 19 Design Quality and Accessibility in New Development</th>
</tr>
</thead>
<tbody>
<tr>
<td>KEY RISKS</td>
<td>• Economic trends</td>
</tr>
<tr>
<td></td>
<td>• Viability</td>
</tr>
<tr>
<td></td>
<td>• Developer / landowner intentions</td>
</tr>
<tr>
<td></td>
<td>• Failure to deliver high quality, appropriately designed schemes across should this policy not be applied consistently.</td>
</tr>
<tr>
<td>MITIGATION</td>
<td>• Policy incorporates criteria which will ensure Knowsley’s existing built and natural environment is complemented through seeking high quality design</td>
</tr>
<tr>
<td></td>
<td>• Design requirements have been viability assessed by evidence.</td>
</tr>
<tr>
<td>TRIGGERS FOR REMEDIAL ACTION</td>
<td>• Identification of a number of appeal decisions upheld for design reasons when analysing MI112.</td>
</tr>
<tr>
<td>POTENTIAL REMEDIAL ACTIONS</td>
<td>• Review policy approach through Local Plan.</td>
</tr>
<tr>
<td></td>
<td>• Consider the need for an associated SPD to provide detailed guidance.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>POLICY OF KLPCS</th>
<th>CS 20 Managing the Borough’s Historic Environment</th>
</tr>
</thead>
<tbody>
<tr>
<td>PRIMARY DELIVERY MECHANISMS</td>
<td>• Site allocation and development management processes.</td>
</tr>
<tr>
<td></td>
<td>• Public and private sector investment</td>
</tr>
<tr>
<td></td>
<td>• Conservation Area Management Plans</td>
</tr>
<tr>
<td></td>
<td>• Prescot Town Centre Townscape Heritage Initiative</td>
</tr>
<tr>
<td>MONITORING INDICATORS (MI)</td>
<td>60, 61, 62, 63, 106</td>
</tr>
<tr>
<td>TARGETS</td>
<td>• Decrease / maintain at zero numbers of historic assets and Conservation Areas at risk (MI 60 and MI 61)</td>
</tr>
<tr>
<td>KEY RISKS</td>
<td>• Developer / landowner intentions</td>
</tr>
<tr>
<td></td>
<td>• Pressure from development needs.</td>
</tr>
<tr>
<td></td>
<td>• Historic assets included on the English Heritage ‘at risk’ register</td>
</tr>
<tr>
<td>MITIGATION</td>
<td>• Policy approach which provides proportionate protection for historic assets based upon their significance.</td>
</tr>
<tr>
<td>TRIGGERS FOR REMEDIAL ACTION</td>
<td>• Any poor performance against MI60 and MI61 identified on an annual basis.</td>
</tr>
<tr>
<td>POTENTIAL REMEDIAL ACTIONS</td>
<td>• Respond to historic assets and Conservation Areas at risk with targeted action to resolve any issues.</td>
</tr>
</tbody>
</table>
### Policy of KLPCS

**CS 21 Greenspaces and Trees**

#### Primary Delivery Mechanisms
- Site allocation and development management processes
- Public sector investment to support the priorities within the Knowsley Green Space Strategy, Liverpool City Region Green Infrastructure Framework and Mersey Forest Plan, as supported by evidence in the Greenspace Audit and Playing Pitch Assessment and Strategy
- Assistance from funding for sustainable transport schemes e.g. Local Sustainable Transport Fund
- Developer contributions

#### Monitoring Indicators (MI)
86, 87, 88, 89, 90, 91, 92, 93, 95, 96, 108

#### Targets
- Performance against quantitative standards set in tables 8.1 and 8.2 of KLPCS (MI86 and MI87)
- Maintain or increase percentage of open space considered to be of good excellent quality etc. (MI 88)
- Increase in resident satisfaction with parks and open spaces (MI 90)

#### Key Risks
- Variable existing provision across Borough
- Pressure to release greenspace for other uses such as development needs for housing and employment
- Reduced public sector resources available to deliver priorities within local standards
- Deliverability of quantitative improvements increasingly reliant upon development contribution or on-site provision

#### Mitigation
- Policy approach focussing upon retaining priority greenspaces based upon quantity, quality and accessibility
- Joint working with Knowsley Green Space Strategy and Playing Pitch Assessment to address shortfalls
- Submission of funding bids as required

#### Triggers for Remedial Action
- Persistent poor or declining performance against target indicators (MI86, MI87 and MI88)
- Future Greenspace Audit or Playing Pitch Assessment could potentially find revisions to standards needed

#### Potential Remedial Actions
- Identification of reasons for under delivery and targeted action to address these e.g. release of public sector assets, land assembly, public sector funding support
- Future review of standards through review of Local Plan

### Policy of KLPCS

**CS 22 Sustainable and Low Carbon Development**

#### Primary Delivery Mechanisms
- Development management processes
- Preparation of supplementary guidance and evidence
- Developer contributions via Allowable Solutions, including potential Community Energy Fund

#### Monitoring Indicators (MI)
37, 47, 48, 59, 79, 80, 81, 109
<table>
<thead>
<tr>
<th>POLICY OF KLPCS</th>
<th>CS 22 Sustainable and Low Carbon Development</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>TARGETS</strong></td>
<td>• Decrease in numbers of households in fuel poverty (MI 37)</td>
</tr>
<tr>
<td><strong>KEY RISKS</strong></td>
<td>• Substantial changes to government guidance for design standards.</td>
</tr>
<tr>
<td></td>
<td>• Economic trends, affecting development viability and compromising design quality of new development</td>
</tr>
<tr>
<td></td>
<td>• Developer/ landowner intentions</td>
</tr>
<tr>
<td><strong>MITIGATION</strong></td>
<td>• Enhanced approach to delivery of pre-application advice</td>
</tr>
<tr>
<td></td>
<td>• Review of design standards undertaken regularly and recognition that these may change</td>
</tr>
<tr>
<td><strong>TRIGGERS FOR REMEDIAL ACTION</strong></td>
<td>• Significant and persistent delivery of unsustainable development</td>
</tr>
<tr>
<td></td>
<td>• Emerging evidence indicating a new policy approach and/or more detailed policy guidance</td>
</tr>
<tr>
<td><strong>POTENTIAL REMEDIAL ACTIONS</strong></td>
<td>• Potential review of policy approach within Local Plan: Site Allocations and Development Policies</td>
</tr>
<tr>
<td></td>
<td>• Provision of additional policy guidance within Supplementary Planning Document</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>POLICY OF KLPCS</th>
<th>CS 23 Renewable and Low Carbon Infrastructure</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PRIMARY DELIVERY MECHANISMS</strong></td>
<td>• Development management processes</td>
</tr>
<tr>
<td></td>
<td>• Preparation of supplementary guidance</td>
</tr>
<tr>
<td></td>
<td>• Developer contributions via Allowable Solutions, including potential Community Energy Fund</td>
</tr>
<tr>
<td></td>
<td>• Energy Services Companies</td>
</tr>
<tr>
<td><strong>MONITORING INDICATORS (MI)</strong></td>
<td>37, 47, 48, 79, 81</td>
</tr>
<tr>
<td><strong>TARGETS</strong></td>
<td>• Decrease in number of households in fuel poverty (MI 37)</td>
</tr>
<tr>
<td><strong>KEY RISKS</strong></td>
<td>• Economic trends and changes to public sector subsidy, affecting the viability of renewable and low carbon installations</td>
</tr>
<tr>
<td><strong>MITIGATION</strong></td>
<td>• Enhanced approach to delivery of pre-application advice</td>
</tr>
<tr>
<td></td>
<td>• Review of public sector funding availability undertaken regularly and recognition that this may change</td>
</tr>
<tr>
<td><strong>TRIGGERS FOR REMEDIAL ACTION</strong></td>
<td>• Emerging evidence indicating a new policy approach, more detailed policy guidance or site-specific allocations</td>
</tr>
<tr>
<td><strong>POTENTIAL REMEDIAL ACTIONS</strong></td>
<td>• Review policy approach and/or site allocations through the Local Plan: Site Allocations and Development Policies</td>
</tr>
<tr>
<td></td>
<td>• Provision of more detailed guidance within a Supplementary Planning Document</td>
</tr>
</tbody>
</table>
### POLICY OF KLPCS CS 24 Managing Flood Risk

| PRIMARY DELIVERY MECHANISMS | • Development management processes  
|                            | • Collation of flood risk assessment evidence  
|                            | • Public and private sector investment |

| MONITORING INDICATORS (MI) | 75, 76, 77 |

| TARGETS | • Target of 0 applications per annum granted contrary to Environment Agency advice (M1 75) |

| KEY RISKS | • Updates to Environment Agency Flood Maps resulting in increased areas of flood risk  
|           | • Developer and landowner intentions  
|           | • Economic trends, affecting development viability and compromising deliverability of SuDS assets |

| MITIGATION | • Review of flood risk information  
|           | • Review of Environment Agency Flood Maps undertaken regularly and recognition that these may change |

| TRIGGERS FOR REMEDIAL ACTION | • Insufficient development land available within suitable locations outside areas of significant flood risk |

| POTENTIAL REMEDIAL ACTIONS | • Review policy approach through the Local Plan: Site Allocations and Development Policies  
|                           | • Provision of more detailed guidance within a Supplementary Planning Document  
|                           | • Allocation of alternative development locations via Local Plan: Site Allocations and Development Policies  
|                           | • Provision of more detailed policy guidance and/or master planning of specific sites |

### POLICY OF KLPCS CS 25 Management of Mineral Resources

| PRIMARY DELIVERY MECHANISMS | • Development management processes  
|                            | • Private sector investment |

| MONITORING INDICATORS (MI) | 71, 72, 73 |

| TARGETS | • No specific target identified |

| KEY RISKS | • Developer and landowner intentions  
|           | • Inadequate production of primary land won aggregates  
|           | • Inadequate production of secondary and recycled aggregates |

| MITIGATION | • Consider need for more detailed policy guidance |
### POLICY OF KLPCS CS 25 Management of Mineral Resources

| TRIGGERS FOR REMEDIAL ACTION | • Significant and persistent under delivery of primary, secondary or recycled aggregates  
• Emerging evidence indicating a need for more detailed policy guidance and/or Mineral Safeguarding Areas |
| POTENTIAL REMEDIAL ACTIONS | • Review policy approach through Local Plan: Site Allocations and Development Policies  
• Provision of more detailed policy guidance  
• Identification of Mineral Safeguarding Areas via Local Plan: Site Allocations and Development Policies |

---

### POLICY OF KLPCS CS 26 Waste Management

| PRIMARY DELIVERY MECHANISMS | • Implementation of the policies within the Merseyside and Halton Joint Waste Local Plan  
• Development management processes  
• Public and private sector investment |
| MONITORING INDICATORS (MI) | 74, 85, 91 |
| TARGETS | • See Merseyside and Halton Joint Waste Local Plan – Table 6.3, page 91—93 (MI 85) |
| KEY RISKS | • Failure in application of the Waste Local Plan policies  
• Provision of unsustainable forms of waste management |
| MITIGATION | • Application of Waste Local Plan policies relating to waste facility safeguarding and site prioritisation (WM1-7) and relating to design and sustainability (WM0, WM8-16)  
• Regular review of evidence and monitoring information |
| TRIGGERS FOR REMEDIAL ACTION | • Significant and persistent failure to meet targets prescribed in Waste Local Plan (see above) |
| POTENTIAL REMEDIAL ACTIONS | • Review of the Plan to change or strengthen policies |

---

### POLICY OF KLPCS CS 27 Planning and Paying for New Infrastructure

| PRIMARY DELIVERY MECHANISMS | • Development management process (including assessments and developer contributions)  
• Preparation of supplementary guidance  
• Public and private sector investment |
| MONITORING INDICATORS (MI) | 23, 24, 29, 40, 47, 48, 59, 64, 65, 69, 70, 80, 91, 92, 96, 113, 114, 115 |
## POLICY OF KLPCS

**CS 27 Planning and Paying for New Infrastructure**

### TARGETS
- Delivery of transport schemes in Knowsley etc. in accordance with the LTP (MI 64)
- % new dwellings accessible by public transport, cycle and walking etc. in accordance with the "Ensuring a Choice of Travel" SPD/LTP (MI 70)
- Delivery of major infrastructure schemes as set out in the Infrastructure Delivery Plan (MI 115)

### KEY RISKS
- Uncertainty regarding availability of public and private sector funding for infrastructure
- Economic trends and viability
- Developer and landowner intentions
- Impact of CIL regulations and other government-led changes on preparation of supplementary guidance

### MITIGATION
- Flexible approach in the KLPCS to policy guidance for developer contributions
- Flexible approach to account for challenging economic circumstances and development viability
- Ability to refresh Infrastructure Delivery Plan content

### TRIGGERS FOR REMEDIAL ACTION
- Significant and persistent under provision of infrastructure, detrimentally affecting new development
- Review of evidence base and IDP

### POTENTIAL REMEDIAL ACTIONS
- Review of Local Plan policy
- Provision of supplementary guidance

### Notes
1. Indicators which are marked in **bold** in the table above are Core Indicators as defined in the Monitoring Framework (SD15).
2. The table contains amendments to the monitoring framework as follows:
   - MI112 "number of appeals upheld" also applies to policy SD1 and will have a local target set;
   - Indicators MI 49,50 and 51 also apply to policy CS.
APPENDIX E

SUSTAINABLE URBAN EXTENSIONS AND SAFEGUARDED LAND – ALLOCATION PROFILES

This appendix contains site plans showing the extent of each location identified as a Sustainable Urban Extension or Safeguarded Land (see Policies SUE 1, 2 and 2a to 2c).

The plans should be read in conjunction with the Council’s Policies Map as modified on adoption of the Local Plan: Core Strategy which shows further planning designations and allocations applicable to each location.

Each Allocation profile identifies the location’s gross size (hectares), primary proposed use(s) and notional development capacity. Each plan is of a different scale due to the differing sizes of each site.

The profiles also identify the key planning constraints and opportunities applicable to each location. The list provided is not exhaustive, and other considerations are likely to apply to each location. The guidance provided should be read in conjunction with Local Plan policies, Supplementary Planning Documents and the Policies Map as appropriate.
Site Name | Bank Lane, Kirkby
---|---
Gross Site Size | 8.52 hectares
Primary proposed use(s) | Residential
Notional Capacity | 207 dwellings

Key Site Constraints and Opportunities

- Flood Zones 2 and 3 are located along the northern boundary of the site (Environment Agency Flood Map, February 2014 Update)
- Local Wildlife Site 61 (Simonswood Brook) is located along the northern boundary of the site
- Tower Hill (Kirkby) Principal Regeneration Area is located to the east of the site
### Key Site Constraints and Opportunities

- The parcel of land north of the A580 contains an electricity sub station and associated infrastructure
- This site is located within the Knowsley Industrial and Business Parks Principal Regeneration Area
<table>
<thead>
<tr>
<th><strong>Site Name</strong></th>
<th>Knowsley Lane, Huyton</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Gross Site Size</strong></td>
<td>40.04 hectares</td>
</tr>
<tr>
<td><strong>Primary proposed use(s)</strong></td>
<td>Residential and employment</td>
</tr>
<tr>
<td><strong>Notional Capacity</strong></td>
<td>94 dwellings and 16 hectares of employment land</td>
</tr>
</tbody>
</table>

**Key Site Constraints and Opportunities**

- This site is located within the North Huyton and Stockbridge Village Principal Regeneration Area
- The western element of the site is identified as public open space and outdoor sporting provision
- Policy SUE 2a) identifies specific development and infrastructure requirements and proposes that a Supplementary Planning Document be developed for this site.
**Site Name**  
Edenhurst Avenue, Huyton

**Gross Site Size**  
7.21 hectares

**Primary proposed use(s)**  
Residential

**Notional Capacity**  
86 dwellings

---

### Key Site Constraints and Opportunities

- Flood Zone 2 and 3 are located along the southern boundary of the site (Environment Agency Flood Map, February 2014 Update)
- Local Wildlife Site 64 (Bowring Park Golf Course, south of M62) is located to the north east of the site
Site Name | Land bounded by A58, Prescot
---|---
Gross Site Size | 14.39 hectares
Primary proposed use(s) | Residential
Notional Capacity | 133 dwellings

**Key Site Constraints and Opportunities**

- The south eastern corner of the site falls within the Prescot Conservation Area
- The northern element of the site is identified as outdoor sporting provision
Site Name | Carr Lane, Prescot
---|---
Gross Site Size | 3.31 hectares
Primary proposed use(s) | Residential
Notional Capacity | 74 dwellings

Key Site Constraints and Opportunities

- Flood Zones 2 and 3 are located along the northern boundary of the site (Environment Agency Flood Map, February 2014 Update)
- Local Wildlife Site 11 (Carr Lane Lake, Prescot) is adjacent to the northern boundary of the site
- This site is located within the South Prescot Principal Regeneration Area
### Key Site Constraints and Opportunities

- Flood Zones 2 and 3 fall within the northern portion of the site (Environment Agency Flood Map, February 2014 Update)
- Local Wildlife Site 75 (Ditton Brook, Halewood) is located along the northern boundary of the site
- Bridgefield Forum (Housing Allocation) is located to the north west of the site
- An area of public open space (woodland) is located within the centre of the site
- Policy SUE 2b) identifies specific development and infrastructure requirements and proposes that a Supplementary Planning Document be developed for this site.
Site Name | South of Whiston
--- | ---
Gross Site Size | 110.3 hectares
Primary proposed use(s) | Residential
Notional Capacity | 1503 dwellings

Key Site Constraints and Opportunities

- Flood Zones 2 and 3 are located along the northern boundary of the site (Environment Agency Flood Map, February 2014 Update)
- Local Wildlife Sites 13 (Lickers Lane Wood, Whiston), 14 (Woodland, Sandfield Park, Whiston), 16 (Big Water, Halsnead), 49 (The Old Wood, north, Halsnead) and Local Geological Site 85 (Cronton Mineral Lone) are located within the site
- The northern fringe also contains existing urban greenspace in the form of outdoor sports provision adjacent to the junctions of Windy Arbor Road / Lickers Lane and a cemetery at the junction of Lickers Lane / Fox’s Bank Lane.
- Policy SUE 2c) identifies specific development and infrastructure requirements and proposes that a Supplementary Planning Document be developed for this site and the Land South of M62 Sustainable Urban Extension which is located directly to the south of the site.
**Site Name** | **Land South of M62**
---|---
**Gross Site Size** | 77.28 hectares
**Primary proposed use(s)** | Employment and country park
**Notional Capacity** | 22.51 hectares of employment land

**Key Site Constraints and Opportunities**

- Flood Zones 2 and 3 are located in the south of the site (Environment Agency Flood Map, February 2014 Update)
- Local Wildlife Sites 18 (Strettles Bog, Cronton Road), 19 (Mine Waste Cronton) and 52 (The Old Wood, south, Halsnead) are located within the site
- Policy SUE 2c) identifies specific development and infrastructure requirements and proposes that a Supplementary Planning Document be developed for this site and the South of Whiston Sustainable Urban Extension which is located directly to the north of the site.
## Safeguarded Land

<table>
<thead>
<tr>
<th>Knowsley Village</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Gross Site Size</strong></td>
</tr>
<tr>
<td><strong>Primary proposed use(s)</strong></td>
</tr>
<tr>
<td><strong>Notional Capacity</strong></td>
</tr>
</tbody>
</table>

### Key Site Constraints and Opportunities

- Local Wildlife and Geological Site 40 (Knowsley Park) is located along the eastern and southern boundaries of the site.
- This land is safeguarded for post 2028 development needs.