

KNOWSLEY LOCAL PLAN: CORE STRATEGY

KNOWSLEY METROPOLITAN BOROUGH COUNCIL

HEARING STATEMENT 3C

Matter 3 HOUSING PROVISION

Issue 3: Whether the KLPCS is sufficiently clear, effective and robust to ensure timely delivery of the proposed amount of housing development.

Questions

3.8 Has the Strategic Housing Land Availability Assessment (SHLAA) been prepared in accordance with current guidance? Is there compelling evidence of specific SHLAA sites that do not meet the available, suitable and achievable tests set out in the NPPF? Has the viability of housing sites been robustly assessed, particularly for sites in regeneration areas?

Preparation in Accordance with Current Guidance

3.8.1 The most up-to-date assessment of Knowsley's housing land supply is in the Housing Position Statement (SD22) and has a base date of 1 April 2013. This assessment has been prepared in accordance with the Strategic Housing Land Availability Assessment (SHLAA) Practice Guidance¹ and section 6 of the NPPF which requires the economic viability of housing land supply to be considered. It also accords with the subsequently published draft National Planning Policy Guidance (NPPG).

3.8.2 Whilst SD22 does not constitute a full update to Knowsley's SHLAA (for the reasons outlined at paragraph 3.2.2. of SD22) it uses a methodology that is consistent with previous SHLAAs. It provides a robust and accurate assessment of housing land supply in Knowsley.

Meeting the "Available", "Suitable" and "Achievable" Tests

3.8.3 The methodology used in the Housing Position Statement (SD22) is consistent with the 10 stage process advocated in the SHLAA Practice Guidance (see figure 3.1 of the Strategic Housing Land Availability Assessment, 2010 (EB03)). Whilst the SHLAA Practice Guidance (page15-17) advises that suitability, availability and achievability be assessed at Stage 7 of the suggested methodology, the Knowsley SHLAA has undertaken this assessment as an iterative process throughout as described below.

¹ Strategic Housing Land Availability Assessment: Practice Guidance (CLG, 2007). This document is considered extant until such time that the NPPG is released in its final form. This is in line with existing Government information available at: <http://planningguidance.planningportal.gov.uk/> (accessed 10.10.13)

- 3.8.4 The methodology and site assessment assumptions used in Knowsley's first SHLAA (EB03) and subsequent annual updates have been scrutinised and agreed by the Joint Knowsley, Sefton and West Lancashire Housing Market Partnership (HMP). The HMP was set up to oversee the SHLAAs of these three authorities in line with Government guidance.
- 3.8.5 The methods used in the 10 stages of the assessment process are described in section 3.3 of the Housing Position statement (SD22). The assessment of availability, suitability and achievability of each site primarily took place at: Stage 3 (Desktop review of information); Stage 5 (Carrying out the assessment); Stage 6 (Estimating the housing potential of each site); and Stage 7 (Assessing when a site will be developed).
- 3.8.6 The main principles that were employed in assessing each test are outlined below.

Suitability

- 3.8.7 Policy and physical restrictions affecting each site were assessed against 25 criteria at Stage 3 (see Table 3.5 of document SD22). Whilst, the resultant scoring has not prescriptively determined the overall suitability of individual sites, the overall score broadly indicates the potential for each site to be developed for housing. The response for the 25 criteria was recorded for each site in the SHLAA database (see Appendices J to L of SD22) and reassessed at each subsequent stage as further information became available.
- 3.8.8 Stage 6 identified the net developable area of each site taking account of physical and planning constraints and the need for on-site infrastructure such as roads, green infrastructure and any non-residential uses. The outcome of this assessment is illustrated in Table 3.9 (net developable area) and Table 3.10 (applied site densities) of the Housing Position Statement (SD22) and has determined the site yield assumptions for each site.

Availability

- 3.8.9 Stage 7 assessed when each site was likely to be developed on the basis of information sources listed at paragraph 3.3.56 of the Housing Position Statement (SD22). As a key part of this process the Council sought to contact the owners of all sites which are allocated, have planning permission or are within the SHLAA. Where contact could not be made, sites were not included within the 0-5 year supply and were made subject to a 20% risk assessment to account for uncertainties regarding delivery (see response to Question 3.10 for further information).
- 3.8.10 Legal and/or ownership issues (including multiple ownerships) were investigated at Stage 3 using a desktop review of the National Land Use Database, planning application data, Call for Sites submissions, developer contact, Council assets data and where necessary land searches.

Achievability (including viability)

- 3.8.11 Where available, feedback from landowners was used to assess the likely phasing of development sites. Where evidence from landowners was not available, the Housing Position Statement (Table 3.11, SD22) used assumptions which broadly align with the findings of the EVA. For Council owned sites, phasing is also informed by the Council's land disposals programme (see paragraphs 3.8.21-22 below).
- 3.8.12 The views of the development industry were sought via public consultation on the first SHLAA (EB03) and targeted consultation with the HMP during subsequent SHLAA updates.
- 3.8.13 The Council's Economic Viability Assessment (EVA) (EB06) was used to assess the financial viability of sites as required by the NPPF (footnote 11). The EVA assesses the economic circumstances in different areas (defined as 'Residential Value Bands' - see Appendix F of SD22). A summary of the methodology used in the SHLAA process is at paragraph 3.3.30-45 of the Housing Position Statement (SD22).
- 3.8.14 In the context of the Council's Principal Regeneration Areas (PRAs) generally a precautionary approach has been adopted. Whilst for some PRAs (notably North Huyton and Tower Hill) the EVA (EB06) finds that the baseline viability position is 'marginal', the Housing Position Statement (SD22) notes that further evidence and site-specific information should be considered when assessing the likely viability of development sites (as listed at paragraph 3.3.42 of SD22).
- 3.8.15 The EVA indicates that one of the main factors influencing viability is the density of development. Therefore when appraising the viability of SHLAA sites (i.e. non-allocated and without permission) it is necessary to consider how viability may change if the cautious densities within the SHLAA were increased at planning application stage. Table 3.13 of SD22 shows the SHLAA densities are on average below that of sites with planning permission.
- 3.8.16 Although the EVA is robust and considers the potential impacts of economic cycles, its detailed analysis represents a snapshot at the base date of the study (April 2012). Circumstances may therefore change. The EVA also uses a range of conservative assumptions to ensure its findings concerning viability are realistic. The EVA focuses on market housing developments, and therefore does not take account of public sector funding provision e.g. Growing Places Fund, Get Britain Building and the HCA Affordable Housing Programme. To illustrate this, a review of completions post 2007/08 (see section 3.6 of SD22) found that a range of development types deemed 'unviable' or 'marginal' by the EVA have been able to come forward despite the current difficult economic conditions.
- 3.8.17 Once the constraints, developer/landowner intentions, phasing assumptions and economic viability had all been assessed a delivery profile for each site was established. At this stage, where there was uncertainty (e.g. because

contact with a site owner could not be established) a 20% 'risk assessment' was applied to the site. The 'risk assessed' figures were then used for the Council's final land supply calculations and housing trajectory.

3.8.18 As a result of this process only a limited amount of dwellings within PRAs are considered deliverable within 5 years when compared to gross site capacity (see Table 1 below). Table 1 illustrates the number of dwellings that are anticipated to come forward within 5 years from 1 April 2013 within each PRA. All figures within this table have been agreed via developer or landowner contact as part of the SHLAA process within the Housing Position Statement (SD22).

Table 1: Number of Dwellings Included in 5 Year Supply by PRA

Principal Regeneration Area	Estimated Delivery within 5 years from 1 April 2013 ²
North Huyton	420
Stockbridge Village ³	88
Tower Hill	90
South Prescott	0

Source: Housing Position Statement (SD22)

3.8.19 The Council's assessment of delivery and economic viability within PRAs is therefore robust and cautious. No residential delivery in South Prescott has been assumed within the next 5 years, as the Council has been unable to contact the landowner and notwithstanding an extant outline planning permission⁴ for 623 dwellings.

3.8.20 The Council owns a significant number of sites within the current land supply and it is therefore relevant to consider its intentions as landowner. The Council has agreed a 'Strategic Land Disposal Programme'⁵ which will promote housing delivery. A packaged approach is being used within which sites which are potentially relatively challenging in terms of viability will be grouped with sites which have fewer potential viability issues. Steps are currently being taken to secure a developer partner to deliver phase 1 of the programme which includes delivery of the Tower Hill (Kirkby) PRA plus four other sites (see CR10). A developer partner is expected to be procured for this phase by September/October 2014 (Table 3.3 of SD22).

3.8.21 Further phases of the land release programme were approved on 9 July 2013 (CR07) which will also take a packaged approach, including sites in North Huyton and Stockbridge Village PRA. The timescales for release of these sites (using assumptions in Table 3.3 of SD22) have been fed into the housing trajectory.

² Inclusive of risk assessment (where applicable)

³ Comprising delivery within SHLAA sites K0201, K0224, K0390 and application app 12/00385/FUL

⁴ Application ref: 11/00385/OUT

⁵ As approved by Knowsley's Cabinet on 18 July 2012 (see CR09/09a) and subsequently updated under delegated powers (see CR07 and CR10)

3.9 Are the density assumptions used in the SHLAA unduly cautious? KLPCS paragraph 5.24 refers to densities “up to 40 dph” being appropriate – is this an upper limit and if so, are there not some locations where higher densities would be acceptable?

SHLAA Densities

- 3.9.1 In order to assess the housing potential of each site the SHLAA process used a range of ‘density multipliers’ – see table 3.9 (net developable area) and table 3.10 (applied site densities) of SD22. This information dictates the site yield assumptions for each site. The density multipliers have also been used in the Green Belt Study (EB08) and Economic Viability Assessment (EB06). These studies have been subject to full public consultation and targeted consultation with the development industry respectively.
- 3.9.2 The densities applied to specific sites in the SHLAA are indicative only and are also cautious. This approach is considered robust as overly optimistic assumptions could have led to future under-delivery of dwellings in relation to anticipated yields and/or established targets and reduced confidence in the SHLAA. Unduly cautious density assumptions can lead to other issues, such as falsely indicating a requirement to allocate additional land.
- 3.9.3 Most sites in the SHLAA have been assigned a density of 30 to 40 dwellings per hectare (dph). These densities are consistent with those of the mainly medium to low density suburban housing which exists in Knowsley (table 3.10, SD22). Higher densities have been assigned where site conditions and/or evidence suggests that these can be satisfactorily achieved. Some sites (without planning permission) in the SHLAA already have indicative site layouts approved by the Homes and Community Agency (HCA) under its Affordable Housing Programme. Where this is the case the resultant development density has been used in the SHLAA.
- 3.9.4 As indicated in table 3.13 of SD22, the average assumed densities of SHLAA sites of 33.2 dph and 31.2 dph for the 0-5 year and 6-10 year supply respectively are well within the correct range when compared with those with existing planning permission which have an average density of 37.5 dph at 1 April 2013.
- 3.9.5 The average density of sites within the first SHLAA (EB03) was 33.5 dph across all phases (see paragraph 5.07 of EB03). Subsequent annual reviews of the SHLAA since 2008 (the base date for EB03) have included a review of all site appraisals, new evidence and engagement with the HMP. The average SHLAA site densities have not changed significantly as a result of this process.

KLPCS, paragraph 5.24

- 3.9.6 The guideline minimum density figure of 30 dwellings per hectare set by policy CS3 seeks to ensure that land required for housing is used efficiently and sustainably. It reflects local circumstances (as required by paragraph 47 of the

NPPF) and is the same as that previously set in national policy and in policy H1 of the Knowsley Replacement Unitary Development Plan (PP01).

- 3.9.7 KLPCS Policy CS3 does not preclude high density development and there are likely to be instances (e.g. proposals for flats/apartments) where densities of more than the 40 dwellings per hectare figure stated in paragraph 5.24 can be achieved. The Council would therefore be willing to consider the following potential modification to KLPCS paragraph 5.24 to clarify that this is the case.

Potential Additional Modification*

Amend Paragraph 5.24 to read:

“[...] However, given housing land availability constraints 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.”

3.10 Is a 20% discount for non-delivery of SHLAA sites appropriate? Is it right to not take windfalls into account?

20% Risk Assessment

- 3.10.1 When developing its first SHLAA (EB03), the Council considered the views of respondents to public consultation, partner Local Authorities⁶ and the Housing Market Partnership (HMP) and concluded that a 20% risk assessment was appropriate.
- 3.10.2 Whilst the assumptions in the SHLAA regarding site availability and achievability are robust, circumstances can change as a result of which some sites may not come forward as anticipated for example due to land ownership or financial constraints. The 20% ‘risk assessment’ allows for such scenarios.
- 3.10.3 Subsequent updates to the SHLAA (e.g. SD22) applied a variable risk assessment of 0% or 20% to each site depending on the level of certainty regarding future housing delivery. No risk assumption was applied for sites where:
- There were no known constraints, the site was allocated or committed, and the owner had been contacted;
 - A Registered Provider of social housing owned the site and obtained an HCA funding allocation to ensure delivery; or
 - Development had started on site and was continuing in April 2013.

⁶ Knowsley’s SHLAA has been developed jointly and to a common methodology with Sefton and West Lancashire Councils

3.10.4 For unallocated sites without permission (regardless of developer contact) a level of 20% was applied due to the increased uncertainties.

3.10.5 Whilst each SHLAA assessment is robust, it only represents a snapshot. The risk assessment applied above accounts for the likelihood of unforeseen circumstances developing and of the deliverability of sites changing between annual SHLAA updates.

Windfall Delivery

3.10.6 The Council did not assess windfall delivery in the first SHLAA (EB03) as 'compelling evidence' as is now required by the NPPF (paragraph 48) could not be demonstrated that such sites have consistently become available. The NPPF states (in Annex 2: Glossary) that windfalls comprise '*sites which have not been specifically identified as available in the Local Plan process*'. In accordance with this definition the Council considers that sites identified in the SHLAA (part of the Local Plan evidence base) should not be regarded as 'windfall'.

3.10.7 It was therefore concluded that any assessment of windfall delivery could only reliably be assessed from 1 April 2008 which is the base date of EB03.

3.10.8 The SHLAA 2012 Update (EB01) provided the first reliable opportunity to assess windfall delivery and concluded that an average of 12 dwellings per annum (dpa) had been delivered on windfall sites between 1 April 2008 and 30 September 2011. Whilst this figure was considered robust it has not been included in the Council's supply calculations. This is primarily due to the short time frame over which this evidence is available and the prevailing housing market conditions which have adversely affected the delivery of new housing.

3.10.9 The Council's Housing Position Statement, 2012 (SD22) did not include an updated windfall assessment. This is because it only included an interim SHLAA update due to the need to reconsider delivery on all sites since 2008 following updates to the housing monitoring system (paragraph 2.1.1 of SD22). The inclusion of a windfall allowance would also have been a key change to the SHLAA methodology which would need to be considered by the HMP. The Council proposes to assess future windfall trends in the annual updates to the SHLAA.

3.11 How much of the need for affordable housing is likely to be met, realistically, over the plan period? What are the implications for the objective of re-balancing the housing market?

3.11.1 In Knowsley, affordable housing delivery up to 2028 is expected to be primarily through:

- Investment by Registered Providers (including the use of funding streams such as the current HCA-funded Affordable Housing Programme); and

- Provision by housing developers (normally secured through legal agreements as part of market housing developments through the application of policy CS15).

3.11.2 It is difficult to predict the amount of affordable housing which will be delivered due to uncertainty over the long term availability of funds such as the Affordable Homes Programme and the investment plans of Registered Providers. Registered Providers also have the option of delivering an element of market housing on sites which they own. There is significant uncertainty over the extent to which market housing development will provide affordable homes due to the necessary flexibility in policy CS15. This policy allows developers to argue for a relaxation in the requirement for 25% of the dwellings provided in market housing schemes to be affordable provided they submit convincing evidence of viability issues. Whilst the EVA (EB06) indicates in general terms the types and locations of new residential development which may face viability issues, the precise extent to which the flexibility built into policy CS15 will affect affordable housing delivery will depend on site-specific circumstances and economic trends.

3.11.3 Table 2 (below) estimates the quantity of affordable housing that is expected to be delivered from the currently committed Affordable Homes Programme schemes and commitments (planning permissions) where the applicant is a Registered Provider. This information is the most accurate available, notwithstanding the caveats regarding uncertainty highlighted above. More detailed information is provided in Appendix 1 of this statement.

Table 2: Affordable Housing Supply in Knowsley, 1st April 2013

Affordable Housing Supply	Years 0-5	Years 6-10	Years 11-15
Affordable Homes Programme	478	0	0
Permissions where applicant is Registered Provider	79	49	33
Total	557	49	33
Grand Total	659		

Source: Housing Position Statement (SD22), Affordable Housing Programme data (Knowsley Strategic Housing Team, 2013)

3.11.4 The majority of the supply identified above is expected to be delivered in the early years of the plan period, due to the increased certainty of delivery associated with schemes currently funded under the Affordable Housing Programme. Further schemes may be included at least in the short to medium term as Registered Providers continue to bid and secure funding. Estimated capacity also exists within SHLAA sites (without planning permission) that are currently owned by Registered Providers for 152 dwellings, although these bodies do as noted above have the option of disposing these sites to a third party to develop market housing if they wish. Appendix 1 has more details of these sites.

- 3.11.5 The above sections describe the affordable housing delivery over the plan period for which there is reasonable certainty at the current time. The Council does not consider it appropriate to estimate the quantum of affordable housing which could be delivered through market schemes, for the reasons outlined above. However the EVA (EB06) indicates that a significant proportion of locations currently within the Green Belt, proposed to be released for housing development under policy CS5 demonstrate substantial surplus in terms of viability. If developed as market housing schemes these sites could therefore make significant contributions towards the provision of affordable homes towards the latter end of the KLPCS plan period.
- 3.11.6 The KLPCS seeks to maximise affordable housing delivery in Knowsley. Despite the difficulties in accurately predicting this delivery it is considered that it in any circumstances it would be very challenging for the KLPCS to deliver sufficient levels of affordable housing to meet the scale of need identified in the Strategic Housing Market Assessment (SHMA) (EB04). This outlined that 568 affordable dwellings would need to be delivered per year to meet affordable housing needs over a ten year period. However, this was never proposed as a realistic target for delivery (paragraphs 14.4.10–14.4.20, pages 180-181 (EB04)). It recommended instead that an affordable housing target of 25% (through market housing schemes) should be instead applied through the Local Plan process, subject to viability.
- 3.11.7 On the basis of the known information about affordable housing supply for the first five years of the plan period it is reasonable to estimate that over 110 affordable dwellings can be delivered on average per annum. This represents around 24.4% of the total annual target for housing delivery and will make a substantial contribution towards the objective of rebalancing the housing market. This figure excludes affordable homes secured through market housing development so is likely to be conservative estimate.
- 3.11.8 The Strategic Housing Market Assessment (EB04) and the Housing Market Update (SD24) indicate that the provision of new affordable housing will help to meet the needs of households living in or wanting to move to Knowsley. The evidence indicates that although a significant proportion of existing housing stock is in affordable tenures, additional options for affordable housing are needed across a range of different tenures, types, sizes and locations.
- 3.12 How exactly will the phased release of housing land be managed? Will the SHLAA sites be subject to phased release and if so, what mechanism will be used? Is the plan effective without the inclusion of a phasing mechanism as part of policy CS 3?**
- 3.12.1 The KLPCS addresses two key principles concerning the phasing of housing land release. These are the need to: maintain a five year supply of housing land at all times (plus appropriate buffer in accordance with the NPPF); and, prioritise development within the existing urban area, including regeneration areas and previously developed land. Under policy CS3 clause 3 the release of Green Belt land for new housing will be undertaken in accordance with the

criteria in policy CS5. The Council has used a “plan, monitor, manage” approach to address this issue, which is explained in policies CS3 and CS5 and their supporting text, with further detail in the Planning for Housing Growth Technical Report (TR01) (section 10, page 157-169). The main principles of this approach are summarised below.

Land within the urban area

3.12.2 Land in the urban area can be developed for housing in an un-phased manner. This includes sites which: have extant planning permissions; are identified in a SHLAA; or are subject to an existing housing allocation and urban windfall sites. Given the limited housing land availability in the urban area to meet requirements over the plan period (as set out in the Housing Position Statement (SD22)), introducing a phased approach to this source of housing land supply would conflict with the presumption in favour of sustainable development in the NPPF (paragraph 14 (PG01)) and the need to increase the delivery of housing (see NPPF, paragraph 47 (PG01)). There is no evidence to justify a phasing policy for this source of housing land supply.

Land currently in the Green Belt

3.12.3 The locations identified to be removed from the Green Belt to meet longer term needs for residential development (paragraphs 5.50 and 5.51 of the KLPCS) will be reserved or safeguarded until they need to be released for development. These locations will be subject to site allocations in the Knowsley Local Plan Site Allocations and Development Policies (KLPSADP) before the date that they need to be released.

3.12.4 The “reserve” locations for housing development will remain undeveloped until the Council is unable to identify a five year “deliverable” supply of housing sites in accordance with policy CS3 (see policy CS5, clause 3 part c). The calculation of this supply will include an appropriate buffer of 5% or 20% in accordance with paragraph 47 of the NPPF. At this point, the Council will identify (either within a Monitoring Report or SHLAA update) that it is no longer able to identify an appropriate supply and these locations are in principle suitable for release. Applicants for planning permission will need to demonstrate that the proposals do not undermine regeneration objectives (under policy CS5 clause 3 part b) and meet other KLPCS policy requirements. Residential development in these locations is expected to have been substantially completed before 2028.

3.12.5 In the “safeguarded” location at Knowsley Village housing development is anticipated to be required only after 2028. Any development in this location before 2028 will be permitted only if, accounting for the additional housing land supply within the “reserve” locations, the Council is again no longer able to identify a five year deliverable supply of land (plus the appropriate NPPF buffer). Any development proposal must also comply with policy CS5 by not undermining any outstanding urban regeneration objectives.

- 3.12.6 A comprehensive approach will be required to the delivery of development in the reserve and safeguarded locations, informed by master planning for the larger locations. The KLPCS does not need to set out internal site phasing as this will be addressed in the KLPSADP, Supplementary Planning Documents or development briefs as appropriate.
- 3.12.7 The approach in the KLPCS to phasing is sound. Changes suggested by representors to the mechanism for release of locations from the Green Belt, which would result in selected and/or all locations being brought forward for development earlier, are contested. The approach of the KLPCS is not unnecessarily restrictive and would enable sufficient levels of development to be developed through all phases of the Plan period. The Plan allows for flexibility in the land supply whilst prioritising urban regeneration objectives consistent with national policy.
- 3.12.8 At the Core Strategy Preferred Option (CSPO) stage (CS04) the Council consulted on proposals for a release of Green Belt sites as 2 phases (referred to as Tier 1 and Tier 2) to prevent the housing market being potentially flooded with new development at a given time. However, following consideration of the consultation responses the Council removed this tiering approach. The approach in the KLPCS submission version will allow greater flexibility, ensure a better range and choice for the market, be consistent with national policy and support the timely delivery of housing over the plan period.

3.13 Is the housing trajectory realistic and deliverable? Does it demonstrate a reliable 5 year housing supply (including NPPF 20% buffer) and developable sites for years 6-10? KLPCS paragraph 5.23 refers to potential review mechanisms if the trajectory is not delivered – what are these and why are they not included in the plan?

General points about the trajectory

- 3.13.1 The housing trajectory in Figure 5.1 of the KLPCS is drawn from the most up-to-date and reliable evidence regarding projected housing delivery in Knowsley. This includes the Housing Position Statement (SD22), Green Belt Study (EB08) and Technical Report: Planning for Housing Growth (TR01).
- 3.13.2 Between 1 April 2010 (the base date of the housing target) and 2013 the Council accrued a backlog of 743 dwellings (Table 7.1 of TR01). The housing trajectory illustrates that this backlog can be addressed fully by 2017/18. This is a year prior to the anticipated year the deliverable housing land supply will dip below the required target in 2018/19, thus triggering Green Belt release.
- 3.13.3 The Council's approach to 'backlog' has been commonly termed the 'residual' or 'Liverpool' method, where backlog is dealt with throughout the remaining plan period. This approach has been supported by a recent appeal decision at Hinckley and Bosworth Council (AD22). Whilst representors have contrasting views regarding the merits of this method as opposed to the 'Sedgefield' method, the Council's approach acknowledges current difficulties within the housing market and ensures the plan period target for new homes is delivered

in full by 2028. Furthermore, the Council's approach appreciates that delivery is likely to increase significantly when wider economic circumstances improve, coupled with the release of a range of large-scale, economically viable and competitive Green Belt locations.

3.13.4 Accounting for historic backlog within years 0-5 in addition to applying the 20% buffer would amount to double penalty for under delivery. It is considered that application of the 20% buffer in line with the NPPF (paragraph 47) is sufficient to boost delivery to necessary levels and ensure deficits are met. Dealing with the backlog within years 0-5 would inevitably bring forward the point when Green Belt land is released. There is a concern that the early release of Green Belt would jeopardise other elements of the strategy, such as the delivery of development within the PRAs and other challenging urban sites which may suffer should an excessive supply of attractive greenfield development locations be made available earlier than necessary in the plan period.

3.13.5 The trajectory will be reviewed on an annual basis. Therefore should the Council continue to under-deliver due to sites becoming un-viable or wider economic issues, the 5-year supply can be adjusted accordingly. In this event Green Belt release may potentially be allowed earlier than currently anticipated thereby allowing greater flexibility for the market to deliver the necessary number of dwellings.

3.13.6 As the Council's priority particularly during the early years of the Plan period is to ensure the delivery of regeneration priorities, this scenario would not be ideal. However, this approach would allow for sufficient flexibility in the strategy and ensure targets can still be met should under-delivery occur over a longer period than currently anticipated. Further details of the trigger mechanisms and remedial measures which will be available in the event of under-delivery taking place over a significant period are set out in appendix 1 to the Council statement on matter 11.

3.13.7 The trajectory is therefore considered to be realistic on the basis of available evidence.

Assembly of the trajectory

3.13.8 In assembling the trajectory the Council has carefully ensured that all components of housing land availability, such as commitments, allocations and SHLAA sites, are supported by evidence of their deliverability as set out below.

3.13.9 The figures for net past delivery have been drawn from the Housing Position Statement (chart 2.1, page 11 (SD22)), which updates housing completions data for the period 2010/11 to 2012/13. The net figure accounts for new builds, losses through demolitions and the impacts of changes of use and conversions.

- 3.13.10 Within the figures for "anticipated delivery – commitments and allocations" the element for "commitments" assesses the extent of new planning permissions for housing development, and reviews previously extant permissions to assess whether they have expired, been completed, or remain unimplemented. Engagement with landowners and/or applicants has helped to determine the likely timescale for delivery of new homes covered by extant permissions.
- 3.13.11 The element for "allocations" is drawn from the SHLAA within which all sites currently allocated for new residential development are assessed to ascertain development capacity and timescales for delivery.
- 3.13.12 Where appropriate a 'risk assessment' of existing allocated and/or committed sites was undertaken to account for uncertainties regarding delivery. The Housing Position Statement (section 3.3.9 and 3.3.10 (SD22)) sets out further details.
- 3.13.13 The figures for SHLAA sites cover the expected timescales of delivery of dwellings in non-allocated or committed sites. The assessment of delivery of all sites has been subject to a risk assessment (including consideration of viability) as outlined in response to Questions 3.10 and 3.8 respectively. The densities applied to each site are robust and consistent with those in committed development sites and have regard to the existing urban character of Knowsley (see response to Question 3.9). The SHLAA process also assesses evidence relating to the Council's land release programme.
- 3.13.14 For reasons which are outlined in paragraphs 3.10.6-3.10.9 of this statement the trajectory does not include any allowance for windfall sites. The Council's approach is explained in greater detail in the Housing Position Statement (section 3.3.76-3.3.82, page 36-37 (SD22)) and in response to Question 3.10 of this Statement.
- 3.13.15 The figures for Green Belt sites are based on figures in the Green Belt Study (EB08) and Green Belt Technical Report (TR03). The site density and capacity assumptions within TR03 are consistent with those utilised by the SHLAA process. The phasing assumptions for Green Belt locations have been informed by developer contact and are consistent with the findings of the EVA (EB06) which identified likely development rates. When including Green Belt sites within the trajectory consideration has also been given to lead-in time to account for pre-planning, planning and development phases. These assumptions are summarised at Table 3.11 of the Housing Position Statement (SD22).

Overall land supply position (1 April 2013)

- 3.13.16 The Housing Position Statement (Table 3.12, page 38 (SD22)) identifies Knowsley's urban housing land supply position at 1st April 2013. The overall land supply position (also including the future Green Belt release) is described in Table 3 and subsequent paragraphs below.

Table 3: Knowsley Housing Land Supply Position, at 1st April 2013

	2010/11 – 2012/13	2013/14 – 2017/18	2017/18 - 2022/23	2023/24 – 2027/28	Plan Period	2028/29 onwards
Net past delivery	607	n/a	n/a	n/a	607	n/a
Commitments/ Allocations	n/a	2076	1334	472	3882	129
SHLAA Sites	n/a	941	858	n/a	1799	n/a
Green Belt Reserve	n/a	n/a	1415	1662	3077	257
Green Belt Safeguarded	n/a	n/a	n/a	n/a	n/a	1093
TOTAL	607	3017	3607	2134	9364	1479
Target	1350	2250	2250	2250	8100	n/a
Surplus / Deficit	-743	767	1357	-166	1264	n/a

Source: Housing Position Statement Table 3.12 (page 38 (SD22)) and Technical Report Table 10.3 (page 166 (TR01))

3.13.17 The following paragraphs summarise the Council's position with regard to identifying land within five year tranches, in accordance with national policy:

- 0-5 years. Sufficient deliverable capacity is available in sites in current urban areas to provide an estimated 3,017 dwellings in years 0 to 5 (i.e. 2013/14–2017/18 inclusive) including commitments, allocations and SHLAA sites. This exceeds the 2,700 dwelling capacity required to establish a five year deliverable supply plus 20% buffer and hence meets NPPF requirements.
- 6-10 years: Sufficient capacity is available in current urban areas to deliver an estimated 2,192 dwellings in years 6 to 10 (i.e. 2018/19-2022/23 inclusive) including commitments, allocations and SHLAA sites. This is just short of the combined annual target for this period of 2,250 dwellings. The trajectory indicates that land to be released from Green Belt locations (in the “reserved” category) will be required from 2021/22 onwards, adding an additional 1,415 dwellings which can be delivered during this five year tranche. This meets NPPF requirements to identify developable locations for years 6-10.
- 11-15 years: Sufficient capacity is available in current urban areas to deliver an estimated 472 dwellings in years 11 to 15 (i.e. 2023/24–2027/28 inclusive) including commitments and allocations. This is substantially below the combined annual target for this period of 2,250 dwellings. The trajectory indicates that land to be released from Green Belt locations (in the “reserved” category) can contribute a further 1,662 dwellings during this period.

- Plan period “headroom”: The Technical Report (table 10.3, page 166 (TR01)) sets out that the trajectory includes a significant “headroom” over and above the Plan period requirement of 8,100 dwellings, with 9,364 dwellings being identified as deliverable between 2010/11 and 2027/28. This “headroom” of capacity for 1,264 dwellings means that the KLPCS incorporates flexibility for the circumstance that some of the identified supply, whether in the urban area or on sites to be released from the Green Belt, does not deliver sufficient new homes during the plan period. Additional flexibility is created through the identification of a “safeguarded” broad location for residential development at Knowsley Village, which is not anticipated to be required until after 2028 (and hence is not included in the trajectory), and is considered capable of delivering 1,093 dwellings.
- Post plan period: Sufficient capacity is available in sites in current urban areas for 129 dwellings to be delivered during years 16 and 17 (2028/29 – 2029/30 inclusive). It is also anticipated that locations to be released from Green Belt (in the “reserved” category) can deliver 257 additional dwellings in the same two years. In addition to the “headroom” described, this provides demonstrable flexibility beyond the plan period.

3.13.18 The Technical Report (section 10.4, page 162-167 (TR01)) explains in detail how the trajectory has set out the likely timescales for the delivery of housing on Green Belt sites, by projecting forward anticipated five year supply positions for future years. This process includes anticipating which level of NPPF buffer will apply in future years to calculate the supply levels that the Council will be required to identify. The trajectory in the KLPCS reflects this process, indicating that 2018/19 is anticipated to be the first year in which the Council is unable to identify a five year supply (plus appropriate buffer) from urban land supply sources. Assuming all reserve Green Belt locations are released at this point, and allowing for an appropriate lead-in time for planning applications and site preparation works, it is reasonably expected that delivery of new homes in these locations could begin from 2020/21 onwards.

3.13.19 The trajectory in the KLPCS represents a snapshot position, using the best available evidence from 1st April 2013. The Council is committed to updating the trajectory on at least an annual basis, reflecting updated delivery rates, as well as new evidence regarding housing land availability. This will enable an updated position to be established regarding the Council’s ability to identify a five year supply (plus appropriate buffer), and hence the position against Policy CS5 in terms of the need for the release of Green Belt for residential development.

3.13.20 The KLPCS and other Local Plan documents will be subject to regular monitoring. The flexibility, contingencies and “headroom” within the policies relating to housing delivery and the trajectory preparation process, mean that the Council anticipates that the Plan will be suitable for use up until 2028. A full review of the KLPCS housing delivery policies will only be necessary in circumstances of exceptional and sustained under-delivery after several years of monitoring. The Monitoring Report will be the most appropriate

place for this issue to be considered, allowing for evidence regarding economic conditions and any other overriding factors to be taken into account. It is not appropriate to define what form this review would take, as it would depend on the circumstances of plan preparation at the time. To clarify this issue, the Council would consider a modification to the supporting text of Policy CS3, as follows:

Potential Additional Modification*

Amend Paragraph 5.23 to read:

“[...]The Council will therefore monitor the trajectory on an annual basis, and implement review mechanisms if necessary as part of its overall approach set out above. It is expected that a review of Policy CS3 would only be appropriate in circumstances of exceptional and sustained under-delivery of housing against the plan period target, to the extent to which the plan can no longer be implemented successfully. The Local Plan Monitoring Report will consider this issue on an annual basis.”

***Note regarding modifications process**

The suggested potential modifications to the KLPCS set out in this statement are put forward to assist the consideration of this matter at the hearing sessions. These and any other potential modifications would need to be approved by the Council's Cabinet and undergo formal public consultation before being considered for inclusion in any version of the KLPCS which is finally adopted.

Appendix 1: Estimated Affordable Housing Supply in Knowsley, 1st April 2013

Table 1: Affordable Homes Programme, as at April 2013

Reference	Location	Net capacity	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28
12/00570/FUL	Quarryside Drive / Simonswood Primary School, Kirkby	25	13	12													
10/000358/FUL	Vacant Land at St. Kevins Drive, Northwood, Kirkby	19		19													
11/000304/FUL	Vacant Land at St. Kevins Drive, Northwood, Kirkby	52	25	27													
12/00128/FUL	Penmann Crescent/Close, Halewood	22	22														
12/00129/FUL	Former Garage Site Between 60 And 62 Penmann Crescent, Halewood	2															
12/00577/FUL	Vacant Land Between Browning Close And Keats Green, Huyton	11	11														
12/00549/FUL	5-12 Dryden Grove, Huyton	11		11													
12/00021/FUL	Land Between 11 And 27 Lancing Close, Halewood	4	4														
12/00210/FUL	Bluebell Park Extra Care 1 – 102 Crawford Gardens (excl No.13), Huyton	101		122													
12/00210/FUL	Alamein/Bluebell Park 1 – 22 Milner Court (excl No.13), Huyton	21															
12/00155/FUL	Vacant Bounded By Kenbury Road, Kenbury Close & Foscoote Road, Northwood, Kirkby	5	5														
12/00588/FUL	Vacant Land Adjacent To 60 Kipling Avenue, Huyton (UDP Allocation H2)	26		26													
12/00760/FUL	Hillingdon Avenue (Halewood Labour Club), Halewood	10	10														
12/00648/FUL	Site of Former St Gabriels Lodge, Seel Road / Hill Crest Avenue, Huyton	15		15													
12/00495/FUL	Kennelwood Lodge 5 - 9 Kennelwood Avenue, Northwood,	3		3													

	Kirkby																
12/00178/FUL	Land Opposite 1-13 Station Road Station Road, Prescot	10	10														
12/00331/FUL	Land To The Side Of 21 Bridge View Drive, Tower Hill, Kirkby	2	2														
12/00302/FUL	Vacant Land Between 16 Bridge View Drive & 1 Nathan Grove, Tower Hill, Kirkby	3	3														
12/00007/FUL	Land Between 85 - 87 Markfield Crescent, Halewood	2	2														
12/00009/FUL	Land Between 81 - 83 Stanford Crescent, Halewood	2	2														
12/00003/FUL	Land Between 4 - 6 Knowl Hey Road Halewood	2	2														
13/00177/FUL	Land at Former Derby Arms, Church Road, Halewood	40		40													
SHLAA Site K0450	Lancashire Watch Factory, Albany Road, Prescot	70				70											
SHLAA Site K0339	Halewood Labour Club, Hillingden Avenue, Halewood	21			21												
Various	North Huyton NDC area (single unit purchased by KHT), Huyton	1	1														
	Total Years 0-5	478															
	Total Years 6-10	0															
	Total Years 11-15	0															

Source: Knowsley Housing Position Statement (SD22) and Affordable Housing Programme data (Knowsley Strategic Housing Team, 2013)

Table 2: Sites with Planning Permission in Registered Provider Ownership, as at April 2013

Reference	Location	Net Capacity	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28
12/00430/FUL	St Johns Community Centre Manor Farm Road, Huyton	4		4													
12/00178/FUL	Land Opposite 1-13 Station Road Station Road, Prescot	10	10														
12/00414/FUL	Vacant Land Lordens Close, Huyton	12	12														
10/00168/FUL	Land Adjacent To Huyton House Close, Liverpool Road, Huyton	6						6									
11/00073/FUL	Land Between 38 And 52 Alamein Road, Huyton	7		7													
Various	North Huyton NDC area*, Huyton	136	29	22	10	8	10	14	8	8	10	10	6	8	6	7	7
	Total Years 0-5	79															
	Total Years 6-10	49															
	Total Years 11-15	33															

**For this location, an approximation of affordable housing delivery has been included, based on average proportions over the site delivery period of approximately 11% affordable housing.*

Source: Knowsley Housing Position Statement (SD22)

Table 3: SHLAA Sites in Registered Provider Ownership, as at April 2013

Reference	Location	Net Capacity	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28
SHLAA Site K0447	Former Garage Site, Arncliffe Road, Halewood	2					2										
SHLAA Site K0073	Rear of Quarry Inn Pottery Lane, Huyton	17				17											
SHLAA Site K0389	Knowsley Southern Primary Support Centre, Arncliffe Road, Halewood	44				20	24										
SHLAA Site K0055	Land adjacent to St Judes Church, Round Hey, Stockbridge Village	2						2									
SHLAA Site K0037	Former 20 - 31 Woodfarm Hey, Stockbridge Village	2						2									
SHLAA Site K0076	Pod 11 Hollow Croft, Stockbridge Village	8						8									
SHLAA Site K0096	Former St. Clems Croxteth Road, Stockbridge Village	43						20	23								
SHLAA Site K0053	266 - 277 Boode Croft, Stockbridge Village	4						4									
SHLAA Site K0061	Land at Pod 10 (west) Boode Court, Stockbridge Village	6						6									
SHLAA Site K0062	Land at Pod 10 (East) Boode Court, Stockbridge Village	6						6									
SHLAA Site K0088	Pod 9 Boode Croft, Stockbridge Village	14						14									
SHLAA Site K0175	Land at Custley Hey, Stockbridge Village	5						5									
	Total Years 0-5	63															
	Total Years 6-10	90															
	Total Years 11-15	0															

Source: Knowsley Housing Position Statement (SD22)