



HOW

**MATTER 2: COUNCIL'S RESPONSE TO
INSPECTOR'S INTERIM FINDINGS
REPRESENTOR REFERENCE: 72**

**Planning and
Environmental
Advisers**

**KNOWSLEY LOCAL PLAN: CORE STRATEGY
STATEMENT ON BEHALF OF PERSIMMON HOMES NORTH WEST LTD
FOR THE RECONVENED HEARINGS SCHEDULED TO
COMMENCE ON TUESDAY 22 JULY 2014**

JULY 2014

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1. INTRODUCTION

- 1.1 HOW Planning (HOW) has been instructed by Persimmon Homes North West Limited (Persimmon Homes) to prepare and submit a further statement in relation to the Proposed Modifications to the Knowsley Local Plan Core Strategy (KLPCS), in advance of the Examination Hearings which are scheduled to reconvene on Tuesday 22 July 2014. The representations are made in relation to land at Knowsley Lane, Huyton, which is identified as a ‘Sustainable Urban Extension’ in the emerging KLPCS, and which Persimmon Homes considers is entirely suitable for the purposes of accommodating a significant residential development immediately. Persimmon Homes is in the latter stages of finalising an option agreement concerning land at this site.
- 1.2 The Provisional Agenda for the reconvened Examination Hearings identifies 2 Matters that will be considered. This statement provides comment on Matter 2: ‘Council’s Response to Inspector’s Interim Findings’.
- 1.3 Within the section of the Provisional Agenda covering Matter 2, a series of questions are identified which aim to address the main matters on which modifications to the KLPCS are proposed. This statement responds specifically to key questions 2.1, 2.2, 2.4, 2.5 and 2.6 (which relate to the short term land supply and release of Green Belt sites), and 2.9 (which relates to the employment land target). Each question is dealt with, in turn, within the subsequent sections of this statement.
- 1.4 Cross references to any technical and evidence based documents within the Examination Library are provided in closed brackets for clarity.

2. QUESTION 2.1 – DESIGNATION OF SUSTAINABLE URBAN EXTENSIONS

- 2.1 The Inspector has asked whether the designation of ‘reserve locations’ as Sustainable Urban Extensions and the omission of a phased approach to their release (new policy SUE 1) is justified by evidence.
- 2.2 Persimmon Homes fully supports the provisions of new policy SUE 1 and considers that it is entirely justified. The proposed redefinition of the areas of land previously identified as ‘reserve locations’ (in particular the land at Knowsley Road, Huyton) as specific site allocations for development, in advance of the preparation of the Council’s Site Allocations Development Policies document (SADP), constitutes the most appropriate solution by which to address the immediate housing land supply problem that has been identified by the Inspector in his Interim Findings report (EX26).
- 2.3 Persimmon Homes considers that part of the land at Knowsley Road, Huyton, could be brought forward for residential redevelopment immediately. As well as making a significant contribution towards helping meet the Borough’s housing need, there would be clear regeneration benefits associated with the delivery of new housing in this location. The site is located at the edge of the North Huyton and Stockbridge Village Principal Regeneration Area and its proposed development could help tackle deprivation, re-balance the housing market and create jobs to serve North Huyton and Stockbridge Village. This is specifically acknowledged at paragraph 6.16 of the emerging KLPCS.

3. QUESTION 2.2 – APPROACH TO SUSTAINABLE URBAN EXTENSIONS

- 3.1 The Inspector has asked whether the approach to Sustainable Urban Extensions adequately addresses concerns about the availability of a five year housing supply.
- 3.2 Whilst Persimmon Homes fully supports the principle of designating ‘reserve locations’ as Sustainable Urban Extensions as a means by which to address concerns about housing land supply within Knowsley, it does not consider that it is appropriate for the KLPCS to provide a specific indication of the number of new dwellings that could be delivered within each of the Sustainable Urban Extensions where this is not clearly justified by evidence.
- 3.3 New policy SUE 2a, which relates to the proposed Sustainable Urban Extension at Knowsley Lane, Huyton, states that the site is allocated for, amongst other things, *“new housing development (in the central part of the site) comprising approximately 100 dwellings, to provide a wider choice of housing to meet local needs”*. Persimmon Homes considers that a substantially greater number of dwellings could be delivered on the Knowsley Lane site. This is in fact acknowledged within the Green Belt Technical Paper (TR03), which was published by Knowsley Council in July 2013. Within this Technical Paper, Table 5.1 (‘Potential Land Use and Development Capacity of Green Belt Areas’) identifies the Knowsley Lane site as having a notional capacity of 252 dwellings.
- 3.4 The provision of 252 dwellings on the land at Knowsley Lane (as opposed to “approximately 100”) would make a significantly greater contribution towards ensuring the delivery of a five year housing supply for the Borough. Moreover, it is likely that such a scale of housing development would be more effective in facilitating the delivery of the other forms of development proposed by the policy, in particular the new employment development proposed in the eastern part of the site, for example through the provision of essential infrastructure which would improve the prospects of a viable business park proposal being brought forward on the site. In addition, the regeneration benefits associated with the development of an increased quantum of new housing on the site, including re-balancing the housing market and encouraging additional inward investment into

the adjoining North Huyton and Stockbridge Village Principal Regeneration Area, would be enhanced.

- 3.5 No explanation is provided within the emerging KLPCS as to why the approximate housing capacity of the Knowsley Lane site that is envisaged by new policy SUE 2a (i.e. 100 dwellings) is significantly lower than the notional figure of 252 dwellings indicated by the Green Belt Technical Paper (TR03), which it is worth noting was published with the specific objective of supporting the preparation of the Core Strategy. On the contrary, the approximate figure of 100 dwellings that is referred to appears to simply represent an arbitrary response to comments made in the Inspector's Interim Findings report (EX26) that "a significant and specified minimum area" of the land at Knowsley Lane, Huyton should be identified in the KLPCS for business park use, rather than one which is justified by any robust technical information or evidence.
- 3.6 Persimmon Homes considers that any quantum of housing development specified for the Sustainable Urban Extensions within the KLPCS should be expressed as a lower limit (i.e. minimum number of dwellings). In the context of the Knowsley Lane site, this would ensure a consistent approach with the other land uses proposed by new policy SUE 2a, namely employment development, for which a minimum area of 17.5 hectares is specified.
- 3.7 Any more prescriptive guidance on the scale of development that could be delivered on the land at Knowsley Lane would be premature in advance of a comprehensive master planning exercise being undertaken for the site, which will be critical to establishing the precise form and scale of residential development (and other land uses) that could be delivered on this proposed Sustainable Urban Extension. Persimmon Homes has commissioned a range of technical investigations on the land at Knowsley Road, Huyton (covering topic areas including ecology, highways and noise) which could be used to inform any master planning exercise undertaken for the site.

4. QUESTION 2.4 – CRITERIA FOR DEVELOPMENT OF SUSTAINABLE URBAN EXTENSIONS

- 4.1 Within Question 2.4, the Inspector has asked whether the criteria to be applied to the development of Sustainable Urban Extensions (new policy SUE 2) are justified and effective.
- 4.2 Persimmon Homes is broadly in support of the criteria listed in new policy SUE 2. In particular, it welcomes the requirement that for each of the locations referred to in policies SUE 2a to 2c (which include the proposed Sustainable Urban Extension at Knowsley Lane, Huyton), the Council will prepare further guidance in the form of a master plan and associated Supplementary Planning Document.
- 4.3 The proposed Sustainable Urban Extensions covered by policies SUE 2a to 2c relate to larger sites which are complex in nature with multiple landowners and/or option agreements to assemble the sites, as well as substantial infrastructure requirements to support delivery. Persimmon Homes considers that this complexity justifies the master planning approach proposed for the Knowsley Lane site.
- 4.4 The preparation of a master plan for the Sustainable Urban Extension at Knowsley Lane, Huyton, led by the Council and incorporating public consultation and engagement with key stakeholders, will be a critical exercise in the context of bringing the site forward for redevelopment.
- 4.5 As mentioned previously in section 3, Persimmon Homes considers that it would be premature for policy SUE 2a to provide any prescriptive guidance on the precise form and scale of development that could be delivered on the site in advance of a comprehensive master planning exercise being undertaken (aside from expressing reasonable lower limits for each land use proposed).

5. QUESTION 2.5 – MASTER PLANNING

- 5.1 The Inspector has asked whether it is appropriate to require the preparation of master plans and associated Supplementary Planning Documents to guide the development of the three largest Sustainable Urban Extensions, which include the land at Knowsley Lane, Huyton.
- 5.2 As explained in the previous section of this statement, Persimmon Homes fully supports the principle of preparing a master plan for the Sustainable Urban Extension at Knowsley Lane, Huyton.
- 5.3 This is entirely the correct approach by which to establish the precise form and scale of development that could be delivered, given the complexity of the site.

6. QUESTION 2.6 – SUBDIVISION OF LAND AT KNOWSLEY LANE, HUYTON

- 6.1 At Question 2.6, the Inspector has asked whether the subdivision of land at Knowsley Lane, Huyton into specific employment (Use Class B1) and housing allocations (new policy SUE 2a) meets the identified needs.
- 6.2 Policy SUE 2a promotes the redevelopment of the land at Knowsley Lane for a new housing development (in the central part of the site) comprising approximately 100 dwellings, new employment development (in the eastern part of the site) comprising at least 17.5 hectares of Business Uses (Use Class B1) and public open space (in the western part of the site).
- 6.3 As explained previously (within section 3 of this statement), Persimmon Homes considers that significantly more than “approximately 100 dwellings” could be delivered on the site. Policy SUE 2a states that the total area of the site is approximately 40 hectares gross. In the event that new employment development was brought forward comprising the minimum size of 17.5ha, the balance of the site would therefore be capable of accommodating a considerably greater number of dwellings than “approximately 100”, even allowing for public open space provision. As mentioned previously, the Council’s Green Belt Technical Paper (TR03) identifies the land at Knowsley Lane as having a notional capacity of 252 dwellings.
- 6.4 The provision of around 252 dwellings on the land at Knowsley Lane (as opposed to “approximately 100”) would make a significantly greater contribution towards meeting the Borough’s housing needs. Moreover, it is likely that such a scale of housing development would be more effective in facilitating the delivery of the other forms of development proposed by the policy, in particular the new employment development proposed in the eastern part of the site, for example through the provision of essential infrastructure which would improve the prospects of a viable scheme being delivered on the site. In addition, the regeneration benefits associated with the delivery of new housing on the site, including re-balancing the housing market and encouraging additional inward investment into the adjoining North Huyton and Stockbridge Village Principal Regeneration Area, would be enhanced.

- 6.5 The approach to the employment allocation within policy SUE 2a is a direct response to comments made in the Inspector's Interim Findings report (EX26) that, on qualitative grounds, there is justification for the early release of Green Belt land to meet the specific needs for a high quality business park (following on from Kings Business Park, which is almost fully developed). In this context, the Inspector has advised that the KLPCS should give priority to identifying Green Belt reserve locations which would meet these specific needs early in the release programme. He has also stated that as part of this process, a significant and specified minimum area of the land at Knowsley Lane, Huyton should be identified in the KLPCS for business park use, notwithstanding the fact that to date there has been no discussion/interest registered regarding the prospect of accommodating employment development on the site.
- 6.6 In accordance with these comments, policy SUE 2a specifies that at least 17.5 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. The explanatory text presented in support of this policy states that 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.
- 6.7 Whilst Persimmon Homes acknowledges the qualitative need to identify the land at Knowsley Lane, Huyton for a high quality business park, and would fully support the early release of land here for this purpose (alongside a residential development), it does not consider that sufficient evidence has been presented to justify the minimum area of 17.5 hectares for this use that is currently specified by policy SUE 2a.
- 6.8 Furthermore, Persimmon Homes is concerned that a minimum area of 17.5 hectares for employment use could potentially limit the scope of the master planning exercise which needs to be undertaken for the site in a comprehensive manner, testing a range of options, in order to establish the precise form and scale of development that could be delivered on the site.

- 6.9 Persimmon Homes does not wish to comment on the appropriateness of any of the other requirements of policy SUE 2a at this stage.

7. QUESTION 2.9 – EMPLOYMENT LAND TARGET

- 7.1 The Inspector has asked at question 2.9 whether the revised minimum target for employment land in the KLPCS policy CS4 (modification M070) is justified by the evidence.
- 7.2 Within the emerging KLPCS, incorporating the latest series of proposed modifications, policy CS 4 states that provision will be made within the Borough for 164 hectares of land to be developed for employment uses over the plan period between 2010 and 2028. By contrast, within the previous Submission Draft version of the KLPCS (July 2013), policy CS 4 made provision for the development of 183.5 hectares of employment land. The proposed modification to reduce the minimum target of employment land to be developed over the plan period is intended to address concerns raised by the Inspector in his Interim Findings report (EX26) that a minimum target of 183.5 hectares of employment land was towards the upper end of the range of probable needs and that a more realistic and achievable minimum target over the plan period is around 160 hectares.
- 7.3 Whilst Persimmon Homes does not wish to respond in detail to this question, it recommends that further consideration should be given to whether the requirement within policy SUE 2a to provide a minimum area of 17.5 hectares of employment land at Knowsley Lane, Huyton is justified by robust evidence and properly takes account of the reduced minimum target of employment land to be developed over the plan period which has been recommended by the Inspector and subsequently incorporated into policy CS 4 as a proposed modification.

8. CONCLUSIONS & RECOMMENDATIONS

8.1 In summary, Persimmon Homes broadly supports the latest set of modifications proposed to the emerging KLPCS by Knowsley Council to take account of the Inspector's Interim Findings report (EX26) in the context of the land at Knowsley Lane, Huyton, subject to the following detailed comments:

- Persimmon Homes considers that a substantially greater number of dwellings could be delivered on the proposed Sustainable Urban Extension at Knowsley Lane, Huyton than the unnecessarily and unjustifiably constrained figure of "approximately 100" that is currently specified by policy SUE 2a.
- Any quantum of housing development specified within policy SUE 2a for the Knowsley Lane site should be expressed as a lower limit (i.e. minimum number of dwellings).
- Any more prescriptive guidance within the KLPCS on the scale of development that could be delivered on the land at Knowsley Lane would be premature in advance of a comprehensive master planning exercise being undertaken for the site, which will be critical to establishing the precise form and scale of residential development that could be delivered on this proposed Sustainable Urban Extension.
- Whilst Persimmon Homes acknowledges the qualitative need to identify the land at Knowsley Lane, Huyton for a high quality business park, and would fully support the early release of land here for this purpose (alongside a residential development), it does not consider that sufficient evidence has been presented to justify the minimum area of 17.5 hectares for this use that is currently specified by policy SUE 2a. On the contrary, this figure appears to represent an arbitrary response to comments made in the Inspector's Interim Findings report (EX26) that "a significant and specified minimum area" of the land at Knowsley Lane, Huyton should be identified in the KLPCS for business park use, which is not justified by any robust technical information or evidence.

HOW Planning LLP

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