

MATTER 2 COUNCIL'S RESPONSE TO INSPECTOR'S INTERIM FINDINGS
QUESTIONS 2.1, 2.2, 2.4, 2.5 AND 2.7
REPRESENTOR REFERENCE: 104



KNOWSLEY LOCAL PLAN: CORE STRATEGY
RE-CONVENED EXAMINATION HEARINGS
EXAMINATION HEARING STATEMENT

On behalf of Linda McLean and Michael Leary
Site Ref: KGBS19 & 20 LAND EAST OF HALEWOOD

Cass Associates

Studio 104
The Tea Factory
82 Wood Street
Liverpool
L1 4DQ

Tel: 0151 707 0110
Fax: 0151 707 0332
E-mail: all@cassassociates.co.uk

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Document Control

Originator	Checked and authorised by
Name of person and qualifications: Peter Hamilton MRTPI	Name of person and qualifications: Peter Hamilton MRTPI
Job Title: Partner	Job Title: Partner
Signature: 	Signature: 

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1 Introduction

- 1.1 This Statement is prepared on behalf of Linda McLean and Michael Leary (Trustee on behalf of M Leary Life Interest 1997 Settlement and R Wright Life Interest 1997 Settlement), the landowners of the majority of land proposed to be allocated at the Sustainable Urban Extension land at East Halewood (site refs.: KGBS19 & 20).
- 1.2 These sites have been previously promoted at the Examination by Taylor Wimpey UK Limited and Redrow Homes Ltd. The Council and the Programme Officer were notified in early June that the landowners wished to be represented by their own planning consultants for the next stages of the Local Plan: Core Strategy process.
- 1.3 The landowners have provided correspondence, at the request of the Council, confirming their ownership and their intention to make the land available for residential development if it is allocated for that use within the Local Plan. This correspondence is shown at Appendix 16 of the Council's Technical Report 'Sustainable Urban Extensions'.
- 1.4 The Inspector in his Interim Findings (ref.: EX26) found that the identification of reserve locations, of which Land East of Halewood is one, for release of land from the Green Belt is sound (Paragraph 11).

2 Short Term Land Supply and Release of Green Belt

Sites

- 2.1 In proposing its modifications to the Local Plan: Core Strategy in respect of the short term land supply and release of Green Belt sites the Council has produced its evidence to support its approach within a Technical Report on Sustainable Urban Extensions.
- 2.2 The landowners support the Council's approach and its conclusions in designating the 'reserve locations' as Sustainable Urban Extensions. It is clear from the evidence provided within the Technical Report that this option (Option 1) of the four options explored is the only option that provides sufficient land supply to enable the Council to meet its five year housing land requirements including the 20% buffer. The other three options all fall short of meeting the five year requirement.

- 2.3 The Technical Report also provides evidence through the Sustainability Appraisal that the allocation of the SUEs at the start of the plan period increases the level of certainty that sustainability benefits will be realised.
- 2.4 In the context of the lack of a five year supply, a phased approach would create a higher level of risk and uncertainty in the Council's ability to meet the housing requirement. As stated in the Technical Report there is little or no evidence to support the rationale for the phasing of the previous reserved sites against one another. If the Council was to make the 'wrong' choice in selecting one or more sites for early release this could have a fundamental effect on the five year land supply. This in turn could lead to pressure for unplanned speculative applications for development on Green Belt sites in other locations within the Borough. This would not lead to positive planning and delivering the right development in the right place at the right time.
- 2.5 The designation of the 'reserve locations' as SUEs on adoption of the Local Plan provides a number of advantages over the other options:
- (i) Provides greater certainty that the Council can achieve its five year supply.
 - (ii) Provides greater dispersal of housing supply across the various housing market areas within the Borough rather than concentrating it within specific locations.
 - (iii) It reduces risks around delivery particularly associated with sites in secondary and tertiary locations where there is not currently a strong housing market.
 - (iv) Provides greater mix in the housing land supply as the current five year supply is predominantly made up of smaller sites in the urban areas of the Borough.
 - (v) Provides for the earlier delivery of infrastructure requirements associated with developments which is not only of benefit to the occupiers of the new developments but also existing nearby communities.
- 2.6 Large sites by their nature have a phased delivery due to the size, regulatory requirements, infrastructure requirements and build rates. Furthermore, locational advantages for housing and landownership dynamics will also influence when development will take place. As such it is considered that there will be a staged delivery on housing in any event. This will provide a higher level of certainty than a policy formulated phased approach which lacks a credible evidence base.
- 2.7 The SUE preferred approach reduces concerns regarding the availability of a five year housing land supply. Based on the Council's Delivery Trajectory for the SUEs (Appendix 14 of the Technical Report) there will be a

marginal over-supply of 134 dwellings in the first five year period. This equates to a 5% buffer over and above the five year supply plus 20%.

2.8 The Table at Appendix 14 shows the East of Halewood site contributing 50 dwellings in years 2017/2018 of the five year supply. From our experience of working on large scale strategic sites it is possible that the site would contribute additional supply within the first five years. This supply could be up to 80 additional dwellings over and above the 50 dwellings identified in Appendix 14. This is based on the following timetable:

- April 2015 – Local Plan: Core Strategy adopted and site removed from the Green Belt.
- July 2015 – SPD and masterplan for site adopted (according to Council’s timetable).
- September 2015 – planning applications submitted – hybrid application with residential outline covering the whole SUE and full for infrastructure and first phase residential development within each parcel (north and south).
- February 2016 – planning permission.
- August 2016 – start on site with two housebuilders (one in each parcel) delivering 40 dwellings per annum).
- April 2017 – 50 dwellings completed for 2016/2017 (year 4 of five year supply)
- April 2018 – 80 dwellings completed for 2017/2018 (year 5 of five year supply).

2.9 This would significantly enhance the five year supply ensuring a robust buffer over the requirement.

2.10 The criteria applied to proposed policy SUE 2 are considered to be justified and effective. The criteria provide the key parameters around which development on the SUEs will be judged.

2.11 The preparation of masterplans and SPDs for strategic sites has been well-established within strategic planning policy. A recent example promoted by Cass Associates was the Woodford Aerodrome Opportunity Site within Stockport Council’s Core Strategy (March 2011). This Green Belt site was identified as an Opportunity Site in the Core Strategy which provided the strategic policy context for its redevelopment. The Core Strategy required a masterplan and SPD to be produced to provide further guidance around the parameters and requirements for redevelopment. Following the adoption of the Core Strategy, the SPD was subsequently produced and adopted in January 2013.

2.12 We consider proposed Policy SUE2b to be appropriate and proportionate. It provides the key development and environmental considerations around the development of the land at East Halewood. It provides clarity for developers, the local community and the decision-taker around both the strategic aspirations and key development requirements for the site.

2.13 As stated earlier, there are two principal landowners, which own the majority of the developable land on the SUE, who are working together in a consortium approach. Once the Local Plan: Core Strategy and the SPD/masterplan are adopted there is a clear and direct route to the delivery of the land for development. There is significant interest in the site from a number of national housebuilders.

2.14 Additionally, no significant off-site infrastructure has been identified to allow development on the site. This provides further evidence to demonstrate the site can be delivered at any early stage of the Local Plan.

3 Conclusion

3.1 In conclusion we consider that the Council's preferred option of designating all of the reserved sites as Sustainable Urban Extensions is the correct approach and based on sound evidence.

3.2 The approach also meets many of the requirements for Local Plans set out in NPPF:

- Positively seeks opportunities to meet the development needs of the area and provides flexibility to adapt to change (Paragraph 14).
- Provides policies that guide how development that is sustainable can be approved without delay (Paragraph 15).
- Provides a practical framework within which decisions on planning applications can be made with a high degree of flexibility and efficiency (Paragraph 17 first bullet point).
- Proactively drives and supports growth and the delivery of homes (Paragraph 17 third bullet point).

3.3 We therefore commend this approach to the Inspector and request that it be incorporated into the Knowsley Local Plan: Core Strategy as set out in the Proposed Modifications.