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Dear Sirs,

KNOWSLEY LOCAL PLAN: CORE STRATEGY – RECONVENED HEARINGS, 2nd & 3rd JUNE 2015

We write in response to some of the questions raised in the Planning Inspector's Agenda documents EX 40 and EX 41, and which he intends to raise in the forthcoming reconvened hearings.

EX40

- 2.1 *Is the Knowsley Local Plan: Core Strategy (KLPCS) in general accordance with the Statement of Community Involvement? Has the KLPCS emerged from an open and transparent process that demonstrates how and why the preferred strategy was selected, in consultation with the public and other stakeholders?***

This matter has already been considered by the Inspector in the prior hearing, namely in Matter 1 of the hearing held on 5 November 2013. The matter was publicly debated for the whole morning on that occasion. The Council stated that they believed they had actually exceeded the statutory requirements in relation to community involvement. The Council has published a lengthy document identifying the processes and procedures it adopted.

- 3.1 *What are the implications of the new household projections for the KLPCS, particularly in relation to the objectively assessed need for housing?***

We consider that whilst the 2012 population figures show a reduction in population growth, they show a growth in household formation. The problem with these figures is

that they simply are based on national and local trends which assume that the status quo will be maintained into the future but, critically, do not account for regeneration and aspiration. There is considerable regeneration happening in the Borough with new jobs re-locating from other Boroughs and new jobs being created. I cite the recent relocation of Matalan to the Borough and the introduction of 2000 new working people. If we were base numbers on the historical net migration without planning for the future regeneration and new job creation, we will plan to fail. We need also to consider the huge historic undersupply and the deliverability, viability and development constraints affecting much of the identified 'supply'. The latter was brought into question in a detailed examination in Matter 3, Issue 3 of the hearing held on 7 November 2013 and resulted in a significant reduction in numbers allocated from existing sites. A significant debate was held in previous hearings on this point with an emphasis on the need for new aspirational housing in the Borough with a rebalancing of the housing mix. For the reasons stated we believe there are no implications for the housing numbers identified in the Core Strategy, as currently drafted and as previously reviewed in past hearings.

3.2 *Are there other changes in the evidence base which materially affect the assessment of housing need, such as any update to the SHMA or changes in market signals?*

We believe that the massive national and regional demand for new housing, following years of under-supply, an improvement in general economic conditions, government assistance for people to step onto the housing ladder and more favourable mortgage lending terms, with forecast low interest rate stability, all serve to increase the housing need. In the Borough, the need for new aspirational housing, the regeneration and marketing initiatives taking place and the creation of new jobs with new aspiring employers, all signal the need for new homes.

3.3 *Are there changes in the evidence base which materially affect the housing land supply assessment (e.g. any significant changes to the availability of housing land, updated data on residential density, revisions to the housing trajectory, etc.)? Does the latest information on housing land availability show any significant variation of recent trends?*

We do not believe there to be any significant changes in the housing supply since the issue was last examined in previous hearings

3.4 *What are the implications (if any) of the Ministerial Statements and PPG revisions for the KLPCS, particularly in relation to:*

a) Development in the Green Belt

We do not believe that the statements in regard to the release of the Green Belt actually change matters, as previously examined. It is a simple fact that if there is insufficient other land to meet both the housing need, either in terms of numbers or the creation of the diversity required in regenerating areas, where re-balancing of the mix is critical to its attractiveness to aspirers.

It is worthy of note that most local authorities in the Merseyside and the North West consider that development on green belt sites is now necessitated by housing need.

EX41

4.3 *Having regard to emerging matters including revisions to PPG relating to Green Belt protection, new household projections, evidence of increased densities on certain housing sites, and so on, and in light of further public opposition, are the proposed SUEs at the following locations justified and consistent with national policy?*

(a) South of Whiston

Whilst on the face of it there has been an increase in public opposition, the arguments put forward are no different to those examined in very lengthy and considerably detailed debates in past hearings, in particular, much of the day on 13 November 2013. Indeed many of the new respondents have simply cut and pasted the documents of past respondents, such is the degree of repetition. There are no substantive arguments which have not already been heard.

(b) South of M62 (employment location)

See comments above under (a) South of Whiston

We are working closely with our fellow landowners within the SUE 2(c) wider site and have considered, in detailed joint discussions with the Council, the nature, timing, content and phasing of planning applications. We have worked closely with the Council's appointed master planners, DTZ, in the drafting of a site-wide master plan and Supplementary Planning Document, prior to suspension of their work, pending the Reconvened Hearings. Joint discussions have been held with the Council in relation to agreement of the terms and content of any planning agreements covering contributions for wider site costs and liabilities and how those liabilities will be apportioned. We have commenced early seasonal ecological studies, where required as part of an Environmental Impact Assessment and have liaised with the ecologists from AECOM and MEAS in their early appraisals.

We look forward to the timely conclusion and adoption of the Core Strategy and bringing the project forward with our landholding partners.

Yours faithfully,

C.J.Stroud, DBA FRICS MCIOB
Director of Development