



TAYLOR WIMPEY UK (REPRESENTOR REF: 119)

**RECONVENED EXAMINATION HEARING STATEMENT- 3RD JUNE 2015
RESPONSE TO CONSULTATION ON MAIN MODIFICATIONS
MATTERS 4 & 5 (EX41)**

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CONTENTS

1. INTRODUCTION	1
4. RESPONSE TO CONSULTATION ON MAIN MODIFICATIONS.....	2
5. ANY OTHER MATTERS	14

Appendix 1- Greenspaces in vicinity of Edenhurst Avenue site

1. INTRODUCTION

- 1.1 This statement has been prepared on behalf of Taylor Wimpey UK Limited (TW) for consideration at the Knowsley Local Plan: Core Strategy Examination. It relates to new matters that have arisen since the July 2014 Hearings and specifically addresses the questions in the Provisional Agenda (**EX41**) for 3rd June 2015, provided by the Inspector in April 2015.
- 1.2 In summary, Taylor Wimpey fully support the Council's further proposed modifications to the Core Strategy as approved in principle at the Council's Cabinet on 10th September 2014. In particular we support the early release of Green Belt sites through their allocation as Strategic Urban Extensions (SUEs), to help address the shortfall of deliverable housing sites over the 5 year period up to 31st March 2018. This modification is one that Taylor Wimpey has sought throughout the Core Strategy process.
- 1.3 Please note, whilst Taylor Wimpey's support the Council's approach to green belt release, this Statement only provides site specific comments on the Edenhurst Avenue SUE which is under their control (**Q4.3 e**).

4. RESPONSE TO CONSULTATION ON MAIN MODIFICATIONS

Sustainable Urban Extensions (SUEs)

Q4.3 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:

e) Edenhurst Avenue, Huyton

- 4.1 Recent changes to national planning practice guidance and the implications of the new 2012 household projections are dealt in a separate Hearing Statement (R006v2) in line with the Inspectors questions in the provisional agenda at **EX40**.
- 4.2 This section of the Hearing Statement responds to the issues raised by representors during the last round of consultation, and the Council's subsequent responses, in relation to the Edenhurst Avenue site. These representations are provided in Supplementary Document **SD35** 'Accounting for Proposed Modifications Representations' (pages 111-122), under the following themes:
- Green Belt Principles (page 111);
 - Proposed SUE Boundaries (page 113);
 - Existing Uses (page 113);
 - Proposed Uses (page 115);
 - Highways (page 116);
 - Flora and fauna (page 118);
 - Flooding (page 118);
 - Air Quality (page 119);
 - Infrastructure (page 119); and
 - Impacts on adjacent areas (page 120).

- 4.3 This statement addresses each of these in turn, by first summarising the issues raised by the representors, then noting the Council's response, before adding our own comments and clarification.

Green Belt Principles

- 4.4 The main issues raised by representors were as follows:

- Council have failed to demonstrate exceptional circumstances for green belt release;

- Previous applications on this site were refused for reasons unrelated to its green belt status, and these still apply.
- Development of site will make minimal contribution to borough's housing need;
- There is sufficient brownfield land which should be exhausted before green belt release is considered;
- Site is greenspace providing an area of separation between Liverpool and Huyton, and its development would be contrary to greenspace strategy;
- Council have failed to demonstrate need for immediate release of site; and
- Support for proposed allocation of site.

4.5 The Council's response notes that the green belt role and function of all the SUE sites has been assessed in detail within the Green Belt Study (**EB08**) and 'Technical Report: Green Belt' (**TR03**), with all the site selections based on robust evidence and summarised in Council Statement **CH05B**. They also confirm that the Inspector has found the Council's approach to be sound in his Interim Findings (**EX26** and **EX34**).

4.6 We agree that the Council's selection of this site is based on robust evidence, and would also refer to our original Hearing Statements (**RH17** page 3; **RH31** pages 6-8; **RH31A** pages 10-11; and **RH31B** pages 24-27), where we clearly set out both the boroughwide exceptional circumstances for green belt release and the reasons why the Edenhurst Avenue site no longer meets the objectives for including land in the green belt¹.

4.7 These documents also address the other specific issues raised by the representors, demonstrating that:

- There is no relevant planning history that would preclude development on this site.
- Early release of this site would have a meaningful impact on housing supply and delivery.
- The SHLAA process has shown that there is insufficient brownfield land to meet the Council's housing needs, both in the first five years and across the full plan period 2010-2028 (see 'Housing Position Statement' **SD22**).
- The site serves no meaningful purpose in separating the towns of Huyton and Liverpool.
- Development of the site would not be contrary to the aims of greenspace strategy, as the current site makes little contribution as a greenspace.

4.8 As such, we feel that the principle of releasing this site from the green belt immediately has been established and requires no further comment.

¹ NPPF paragraph 80

Proposed SUE boundaries (Page 113)

4.9 The issues raised by representors were as follows:

- Support for lack of a cap on dwelling numbers (on basis that numbers could increase if developable area is increased through flood risk mitigation); and
- Suggestion that Council retain control of a band of land at the western boundary, as this is the local authority boundary between Liverpool and Knowsley.

4.10 The Council's response notes that the 86 dwelling figure is a 'notional capacity', informed by evidence in the Technical Report TR07, which could be amended within the final layout if appropriate justification is provided within a future application. In respect of the SUE boundary it notes that whilst green belt boundaries must be robust and permanent, this does not preclude the potential for development layouts to incorporate areas on the periphery of the site where no residential development is proposed.

4.11 We fully support the Council's flexible approach to this issue and can confirm that any increase in dwelling numbers would be fully justified within any planning application, which would include a full Flood Risk Assessment.

4.12 In relation to control of the local authority boundary it should be noted that the Edenhurst Avenue site is in private ownership and therefore is not under the Council's control.

4.13 Accordingly, it is Taylor Wimpey's view that this issue requires no further comment.

Existing uses (page 113)

4.14 The main issues raised by representors were as follows:

- There is a shortage of greenspace in the borough;
- Site is a barrier to noise from the M62 and acts as a valuable lung and green corridor;
- Site contains TPO'd trees;
- Council has not updated its evidence base in over 10 years;
- Existing site is badly managed and supervised, has led to arson, antisocial behaviour and illegal tree felling; and
- Site is fenced off which has cut-off public right of way and meant site cannot be accessed for inspection or surveys.

4.15 The Council's response reiterates that the green belt role and function of all the SUE sites has been assessed in detail within the Green Belt Study (**EB08**) and 'Technical Report: Green Belt' (**TR03**), with all the site selections based on robust evidence and summarised in Council Statement **CH05B**. They also confirm that the Inspector has found the Council's approach to be

sound in his Interim Findings (**EX26** and **EX34**). They also note that the status of greenspace and outdoor sports provision has been addressed within the Knowsley Greenspace Audit (**EB21**) and Knowsley Playing Pitch Assessment and Strategy (**EB22**), which both indicate that the Edenhurst Avenue site is surplus to requirements to meet local standards in terms of public open space and outdoor sports provision.

4.16 The Council's response also notes that any impacts relating to noise, trees and public rights of way would be assessed at planning application stage, against the policies in the Core Strategy, with appropriate mitigation identified where necessary.

4.17 We fully agree with the Council's position and refer to our original Hearing Statement (**RH31A** page 8), which fully justifies the loss of this existing 'urban greenspace'. We can also confirm that issues relating to noise, trees and public rights of way would be fully addressed in the supporting documentation for any planning application at the site.

4.18 We also provide additional clarification on the following points:

- Development would not leave insufficient green space or remove an important green corridor from the area, as open space will be provided on site and there is a surplus of approximately 12 Ha of greenspace in the wider area (which includes Court Hey Park, the National Wildflower Centre and several other greenspaces shown on the plan attached at **Appendix 1**, which comes from the Knowsley Green Space Audit **EB21**).
- The evidence base is up to date, with the Greenspace Audit and Playing Pitch Assessment published in 2012.
- The site has been accessed for the relevant inspections and initial surveys, with further survey work to be undertaken at the planning application stage (see para 4.13).
- Redevelopment of the site will increase supervision and surveillance making it more accessible and reducing the likelihood of vandalism/ arson.

4.19 As such, we feel that the loss of the existing greenspace has been justified at this site and does not require any further comment.

Proposed uses

4.20 The main issues raised by representors were as follows:

- No demand for housing in the area;
- Lack of sports facilities in the area;
- Site is undeliverable;
- No evidence that undevelopable part of site would bring community benefits;
- Site has historically been used for agriculture/ urban greenspace/ educational land;

- Council working with developers/ speculators to secure site;
- Lack of detail on how development will look (no need for open space on site, houses should be similar style to existing); and
- Land could become available to travellers.

4.21 The Councils response states that their 2014 Annual Monitoring Report (PP30, ref MI 86, pages 92-99) confirms there is no current deficit of outdoor sports provision in Huyton Community Area, when measured against the requirements of emerging Local Plan Policy CS21. The Council also reiterates that the green belt role and function of each SUE site has been assessed in detail within the Green Belt Study (**EB08**) and 'Technical Report: Green Belt' (**TR03**), with all the site selections based on robust evidence and summarised in Council Statement **CH05B**. The Inspector has found the Council's approach to be sound in his Interim Findings (**EX26** and **EX34**).

4.22 Their response also clarifies that the detailed design and layout of any future proposal (including the location of any on-site open space or community facilities) would be addressed at the planning application stage, and assessed against the policies in the Core Strategy at that point.

4.23 Taylor Wimpey fully agree with the Council's position and note that the proposed residential use of the site has been justified throughout our Hearing Statements, (particularly **RH07/RH17** and **RH31B** page 24-47). It has also been demonstrated that redevelopment of the site would not lead to a deficit in outdoor sports provision within the Huyton Community Area, within which the Edenhurst Avenue SUE is located (**RH31A**, page 8). We can also confirm that:

- There is significant demand for housing in the area.
- The site is deliverable.
- The site was most recently used as a private sports ground, rather than agricultural or education use.
- Developers such as Taylor Wimpey have worked alongside Council to promote sites to help meet housing needs, but through a proper and transparent process, with all correspondence and representations available to view on the Local Plan Examination page of the Council's website.
- Local residents will be consulted as part of any planning application, both through the Council's formal application procedures and through informal consultation from Taylor Wimpey, who are committed to community involvement.
- The land will not be made available to travellers whilst it is within Taylor Wimpey's control.

4.24 Finally, the new household projections (2012 SNHP) have not materially altered the housing need position in Knowsley and this has been addressed in more detail in our accompanying Hearing Statement (Ref: R006v2) covering Matter 3 of the Inspectors questions in **EX40**.

4.25 Overall, it has been demonstrated that residential development of this site is acceptable and would not impact on outdoor sports provision. As such we provide no further comments on this matter.

Highways

4.26 The main issues raised by representors were as follows:

- Heavy congestion on Childwall Valley Road, Roby Road and local network in general;
- School creates significant traffic and parking issues;
- Access roads are not of sufficient quality to support new development;
- Insufficient consideration of local traffic issues and accident risk;
- Local people prevented from reaching Childwall Valley Road services on foot; and
- Concern that linking Edenhurst Avenue and Childwall Valley Road would create a cut through.

4.27 The Council's response confirms that highways matters have been considered as part of all the proposed SUEs, through strategic studies (Transport Feasibility Study **EB10** and Transport Modelling Report **EB11**) and liaison with infrastructure providers, but that no significant issues have been identified that would prevent the development of any of the SUE sites. In respect of Edenhurst site, the Feasibility Study indicates that the site could be accessed from Edenhurst Avenue or Sarum Road without generating capacity issues, although it notes some junction improvements might be required (at Roby Road and Childwall Valley Road respectively).

4.28 The Council's response also notes that the requirement for on or off-site highway works would be best assessed and agreed at the planning application stage in accordance with Policies CS7 and CS27, rather than being dealt with through the examination process.

4.29 We fully support the Council's response. We would add that highways and access matters have been considered within our original Hearing Statements (**RH31A** pages 6-7 and Appendix 4- 'Traffic Issues Statement' prepared by Croft Transport Solutions; **RH31B** pages 35-37, 43). These documents confirm that the Edenhurst Avenue site is sustainably located, accessible by a range of transport modes and can be accessed from Edenhurst Avenue without any significant impact on the local highway network.

4.30 We can also confirm that a detailed Transport Assessment would be provided at the application stage, providing a more in depth analysis of local capacity and safety issues as well as traffic flows, and accident records, based on the final number of proposed homes. In addition we provide further confirmation on the following points raised by the objectors:

- There is sufficient capacity within the local network of roads and junctions to accommodate the proposed development (even taking account of the impact of the local school).
- This does not represent inappropriate development as highways and access constraints are not severe (in line with paragraph 32 of the NPPF).
- The number of personal injury accidents in the area is low, and there is no evidence that development of site will increase this risk.
- The bus stops on Childwall Valley Road can be accessed by foot.
- There are no vehicle links through to Sarum Road proposed by Taylor Wimpey, therefore site and wider Bowring Park area will not be used as a shortcut to the M62.

4.31 Accordingly, the available evidence confirms that development of this site will not create any adverse highway impacts and therefore we do not provide further comments on this.

Flora and Fauna

4.32 The main issues raised by representors were as follows:

- Site is home to a variety of flora and fauna (small mammals, bats, foxes, badgers and 35 varieties of bird);
- Site once contained an ancient circle of holly bushes with considerable historical significance; and
- Development will disconnect areas of green belt which provide habitats.

4.33 The Council's response confirms that the site is not a designated Local Wildlife Site and that habitats for flora and fauna have been considered within all of the proposed SUEs, with the protection of biodiversity assets being key to the selection of appropriate SUE locations, and the developable areas within these locations. The Council also note that any impacts relating to flora and fauna and their habitats would be addressed within the supporting documentation for any future planning application at this site, and would be assessed against Core Strategy policies CS8 and CS19 at this point, with appropriate mitigation identified and where necessary.

4.34 We fully support the Council's response and would also refer to our original Hearing Statements (**RH31A** pages 5-6 and Appendix 3 'Site Opportunities Plan'; **RH31B** pages 41) which confirm that there are no designated wildlife sites within the immediate vicinity of the Edenhurst Avenue site and that there are no other ecological constraints which would prevent development coming forward.

4.35 In respect of the circle of ancient holly bushes, this site is subject of a group Tree Preservation Order which will ensure that the higher quality trees and vegetation will be retained as part of

any future development. A desktop heritage assessment (**RH31A** page 9) also confirmed that there are no known areas of historic importance in the wider area.

4.36 Accordingly, it has been demonstrated that there are no ecological issue to prevent the release and allocation of this site and therefore we do not provide any further evidence on this matter.

Flooding

4.37 The main issues raised by representors were as follows:

- Flood risk mitigation works would be expensive to the taxpayer;
- Site is on a water table with danger of possible subsidence; and
- Flood risk area should not be opened up, so as to prevent crime and antisocial behaviour.

4.38 The Council's response confirms that flood risk issues have been considered throughout their evidence base, from the Green Belt Study (EB08) to the 'Level 2 Strategic Flood Risk Assessment' (SFRA) undertaken by Capita Symonds and endorsed by the Environment Agency (**EB15**). It also notes that a more detailed Flood Risk Assessment will be required at the planning application stage, in accordance Policy CS24, and any appropriate mitigation works would be agreed at this stage.

4.39 We agree with the Council's position and can confirm that flood risk has been addressed within our previous Hearing Statements (**RH31A**- pages 4-5; **RH31B**, pages 42, 43, 50 & 51) and is also referred to in our accompanying Hearing Statement (Ref: R006v2). The Council's SFRA identified that some of the site falls within Flood Zones 2 and 3a, but further modelling work (also undertaken by Capita Symonds on behalf of Taylor Wimpey) confirmed that this can be mitigated through altering site levels. We can confirm that any planning application would be supported by a detailed Flood Risk Assessment which addresses these issues.

4.40 We also provide additional clarification on the following points raised by representors:

- The costs of any flood risk mitigation within the site would be borne by the developer not the taxpayer.
- Issues of subsidence and structural stability would be addressed at the detailed design stage through the Building Regulations system.
- Any areas of flood mitigation or open space within the final development would follow the principles of secured by design and natural surveillance to minimise antisocial behaviour.

4.41 Therefore the evidence suggests that the flood risk issues on the site can be overcome at the planning application stage with no further comment required at this time.

Air Quality

4.42 The main issues raised by representors were as follows:

- Pollution from traffic is already high;
- Site currently decontaminates the pollution residents suffer from the M62, B5080 and B5178 and muffles noise pollution; and
- Any further development will increase carbon footprint of the area due to the need to use cars, causing health issues.

4.43 The Council's response notes that the 2014 Annual Monitoring Report (PP30) indicates that there are no Air Quality Management Areas (AQMAs) in Knowsley and that no air quality issues have been raised during the process of identifying the SUEs. It also notes that potential for impacts on air quality arising from new development will be assessed at the planning application stage, in accordance Policy CS2.

4.44 We have not submitted or reviewed any specific evidence in respect of Air Quality, as this has not been requested, and we would only expect to provide detailed information such as this at planning application stage in line with the Council's response.

4.45 As such, we are not aware of any evidence to suggest that this area suffers from high levels of air pollution that may cause health issues, as suggested by some representors.

Infrastructure

4.46 The main issues raised by representors were as follows:

- Local primary school is already oversubscribed, and whilst it is under consultation to increase capacity, this is only to serve existing residential developments in Liverpool;
- Nearest primary school within borough is 1.7km away and has no public transport means to and from it;
- No facilities in Roby region of Knowsley, so residents rely on services in Liverpool;
- Local doctors services are stretched;
- Proposals would put strain on local shops on Rimmer Avenue;
- Local services that will be drained by development of the site, have not been consulted.

4.47 The Council's response confirms that infrastructure provision has been considered as part of all the proposed SUEs through liaison with a range of infrastructure providers, with no significant capacity issues identified in ensuring that SUEs can be served by appropriate infrastructure, including schools and doctors. Their response also notes that any infrastructure improvements that are necessary as a result of development can be assessed at the planning application stage

in accordance with Policy CS27. Finally, in terms of retail and service provision they note that the Rimmer Road local centre is within 750m of the site with additional facilities also accessible in the neighbouring areas of Liverpool which adjoin the site.

4.48 We fully support the Council's position and refer to our previous Hearing Statements (**RH31A**- pages 7-8 and Appendix 5; **RH31B**, pages 35-37 & 43) which have demonstrated that there is sufficient infrastructure and services in the surrounding area to support the proposed development.

4.49 These statements also address the other specific points which have been raised by representors on this theme, demonstrating that:

- There is sufficient school capacity within the Huyton and Roby townships to support the proposed development.
- There are two primary schools within 200m of the site.
- In terms of retail, Rimmer Road local centre is approximately 500-750m north of the site, with Belle Vale District Centre, which offers a wider range of services including a Morrisons, only 1.2km away and accessible by bus.

4.50 Accordingly there is no evidence to suggest that the proposed developments would have any adverse impacts on local infrastructure, therefore we provide no further comments on this matter.

Impacts on adjacent areas

4.51 The main issues raised by representors were as follows:

- Increased traffic would create disruption for residents, particularly during construction;
- Visual impact will be detrimental to existing visual amenity including views of Runcorn;
- Development would destabilise current estate design;
- Development would not add to sustainability of area as offers no social facilities or new infrastructure;
- Community benefits of development have not been demonstrated; and
- Development will result in declining property values and loss of quality of life.

4.52 The Council's response acknowledges resident's concerns, but confirms that there is no evidence to suggest that appropriately designed new development would cause significant harm to the quality of life of existing residents to an extent that would render the Core Strategy unsound. It goes on to note that the specific local impacts will be assessed against the relevant Core Strategy policies, once the detailed design of the scheme is finalised as part of a planning application, with any mitigation measures or contributions identified at this point.

- 4.53 Taylor Wimpey agree with the Council and would add that the whilst the specific local impacts will be addressed in detail as part of any planning application, the wider impacts of residential development at this site on the surrounding area have been considered throughout our Hearing Statements and within the Council's evidence base in selecting the SUEs.
- 4.54 Notwithstanding this, we provide additional clarification on the specific issues raised by representors:
- Construction traffic will be controlled and managed via planning conditions (including the requirement for a Construction Management Plan).
 - Visual amenity issues will be addressed through the planning application process, although the site is already well contained and screened, so this should not be a significant issue.
 - Residential development will support local services through increased spending and patronage.
 - There is no evidence that development of this site will reduce property values in this area, and this is not a valid planning consideration in any event.
 - The various benefits (economic, social and environmental) of the scheme would be set out at the planning application stage and weighed in the planning balance against the impacts in line with the NPPF.
- 4.55 As such there is no evidence to suggest that the residential development of this site would have any adverse impacts on the adjacent area.

Wording of Main Modifications

Q4.4 Are further adjustments to the wording of the following policies necessary?

a) SUE 2

- 4.56 Whilst Taylor Wimpey fully support the Sustainable Urban Extensions and the wider principles of sustainable development we would question whether it is necessary to include such a comprehensive list of requirements (a-j) as the majority simply refer to other policies within the plan or repeat principles that are inherent within national guidance. As such it may be that some of these criteria can be removed.

b) SUE 2a-2c

- 4.57 Taylor Wimpey have no comment on this modification.

c) CS 11

- 4.58 Taylor Wimpey have no comment on this modification.

d) CS 20

- 4.59 Taylor Wimpey support this modification because it introduces a cost/ benefit analysis into the consideration of heritage matters in accordance with the NPPF.

e) CS 22

- 4.60 Taylor Wimpey support this modification in principle, particularly the removal of Code for Sustainable Homes targets and reference to the new Housing Standards; however the wording should be updated to reflect the recent government updates (Planning Update- 25th March 2015; Technical Housing Standards Review- 27th March 2015), with reference to the internal space standards within the NPPG (added 27th March 2015) and the changes to the Building Regulations which come into force on 1st October 2015.

f) Allocation Profiles

- 4.61 Taylor Wimpey support the allocation profiles in Appendix E, particularly the Council's flexible approach to dwelling numbers and site boundaries as set out in **SD35** and noted in paragraph 4.7 above.

5. ANY OTHER MATTERS

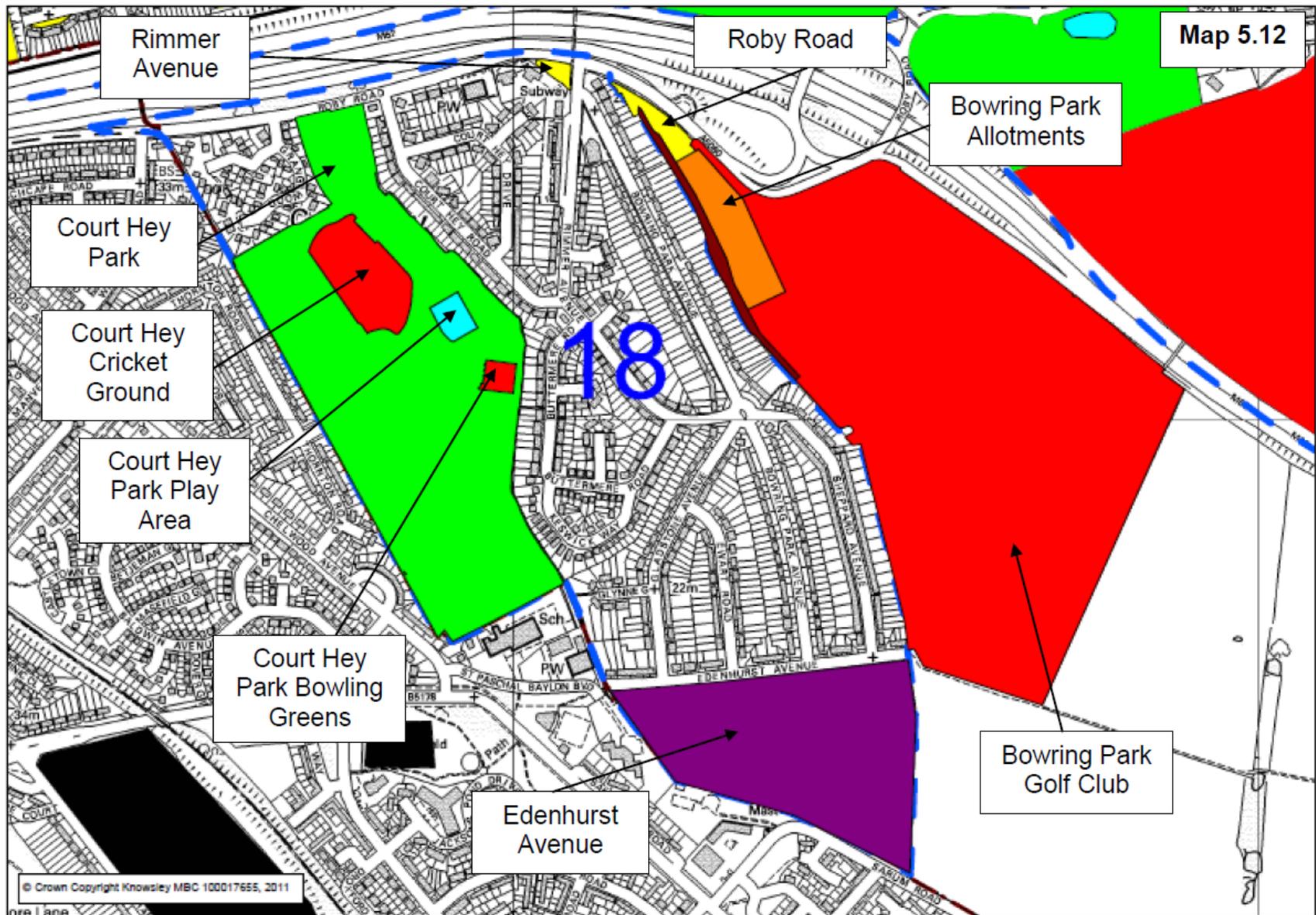
5.1 Below we make additional comments on the wording of Policy CS17, which relates to the comments on 'housing for older people' in our accompanying Hearing Statement (R006v2) covering the Inspectors questions in **EX40**.

CS17

5.2 Taylor Wimpey support this modification in principle, particularly the fact that the residential design standards are '*encouraged*' rather than '*required*' and note that there is already flexibility in the policy with the phrase '*or equivalent replacement standard*'.

5.3 That said, the wording of this policy should be updated to reflect the recent government updates (Planning Update- 25th March 2015; Technical Housing Standards Review- 27th March 2015), and particularly the replacement of Lifetime Home Standards with the optional Category 2 standard within Part M of the Building Regulations.

Appendix 1- Greenspaces in vicinity of Edenhurst Avenue site



Typology	Outdoor Sports (Schools)	OS (Other LA)	Natural & Semi Natural	Cemeteries	Private Greenspace	Amenity Greenspace	Parks & Gardens	Children & Young People	Allotments	Outdoor Sports
Colour										