



Supplementary Statement in Response to Matter 2: Spatial Development Strategy and Principles

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To Programme Officer
From Nathaniel Lichfield & Partners
Copy Taylor Wimpey UK Limited and Redrow Homes Limited [ref: 1104]

**Subject Knowsley Local Plan Core Strategy Examination:
Matter 2: Spatial Development Principles**

1.0 Introduction

- 1.1 Nathaniel Lichfield & Partners [NLP] was instructed by Taylor Wimpey UK Limited [Taylor Wimpey] and Redrow Homes Limited [Redrow] to make representations on the Publication Knowsley Local Plan Core Strategy [PWLLP] in 2012.
- 1.2 The following supplementary statement outlines the further submissions of Taylor Wimpey and Redrow in relation to the forthcoming Examination in Public [EiP] hearing session concerning Matter 2 (Spatial Development Strategy and Principles). Separate submissions have been lodged on behalf of Taylor Wimpey and Redrow Homes to address Matters 3 (Housing Provision) and 5 (Green Belt).
- 1.3 This statement supplements Taylor Wimpey and Redrow's earlier representations in relation to the Spatial Strategy for Knowsley [Reference 1104]. Policy CS1 fails the soundness tests because:
- 1 It is not justified. The Council considers that Green Belt release is only needed to meet longer term needs for housing. It is considered that there is an immediate need to review Green Belt boundaries in order to meet short term housing requirements in certain areas of the Borough. Land in the Green Belt should be allocated now for housing to meet the Council's objectively assessed needs and to boost the supply of housing.
 - 2 It is not effective. The Policy fails to make adequate provision to enable the Council to deliver its housing requirement beyond the initial first five years of the plan period.
 - 3 It is not consistent with national policy. Policy CS 1 (2) (a) would not necessarily deliver housing that reflects current and future demographic trends as well as local demand.

1.4 This statement expands upon these representations in the light of the Inspector's questions. Where relevant, the comments made are assessed against the tests of soundness established in the 2005 Act and those in the National Planning Policy Framework [the Framework].

2.0 **Policy Context**

2.1 The relevant planning policy context for this statement is provided by national planning policy contained in the National Planning Policy Framework [the Framework]. At the heart of the Framework [§14] is a presumption in favour of sustainable development which should be seen as a golden thread running through both plan making and decision taking.

2.2 Other relevant policy requirements of the Framework relevant to Matter 2 are provided at §47, §82 – §85, §154, §156-§160, §173 & §182.

3.0 **Planning Issues**

3.1 Taking account of the policy context outlined in this paper we respond to Issues 2.4, 2.5 & 2.7 of the Inspector's EiP questions.

Issue 2.4 – Is the strategy for Green Belt in Policy CS 1 consistent with the National Planning Policy Framework (NPPF)? Does the use of Green Belt Land for development satisfy the 'exceptional circumstances test' of national policy and if so, for what reason? Should the use of Green Belt land be limited to meeting longer term needs?

3.2 Taylor Wimpey and Redrow consider that there is an immediate need to amend Green Belt boundaries in order to meet short term housing need across the Borough. Taylor Wimpey and Redrow consider the use of Green Belt land satisfies the 'exceptional circumstances' test of the Framework [§82] and is **justified** for the following reasons:

- 1 The KLPCS makes provision for 8,100 new dwellings to be delivered in Knowsley between 2010 – 2028, at annual average of 450 dwelling per annum. The Council's Housing Position Statement indicates that there is an over-supply in the first 5 years (767 dwellings), an under supply of 58 dwellings in the 6-10 yr period and a shortfall of 1778 in the 11-15 yr period. On the basis of the Council's calculations there is therefore a combined shortfall of 1069 dwellings. As a consequence, the Council acknowledges that there remains a clear need to consider where longer term housing growth could be accommodated.
- 2 There is an urgent need to reverse the trend of under delivery and boost the supply of deliverable housing sites. There is insufficient land within the Knowsley defined urban area to meet the future development requirements of the emerging LPCS. It is acknowledged in the Council's evidence that Green Belt release will be required. Knowsley is tightly

constrained both within the urban area (having already been developed) and outside of the urban area (being constrained by Green Belt). The level of development required in Knowsley identified in the emerging LPCS cannot all be accommodated on existing brownfield sites within the urban area. The Council has resolved to review the Green Belt boundary to accommodate its economic and housing needs. Green Belt land will be allocated for new uses to accommodate future growth. Overall there is no alternative land to accommodate the Council's future employment and housing growth needs to 2028 and beyond. Green Belt Sites such as East Halewood and Edenhurst Avenue, Huyton are needed now to meet the shortfall of supply and future growth requirement.

- 3 The adoption of the Framework in March 2012 and the revocation of the Regional Strategy on the 20th May 2013 has provided a major change in circumstances which has made the adoption of this exceptional measure necessary. Indeed, the RS was considered to be critical to the review of Green Belt boundaries and the selection of "broad locations" within the Green Belt for longer term development. Policy RDF4 outlined that the general extent of the Region's Green Belt should be maintained and indicated that there was no need for any "exceptional substantial strategic change" to the Merseyside Green Belt before 2011 and set a presumption against such "exceptional substantial strategic change" after 2011 unless a sub-regional study showed a clear need for this. There is a clear need for Green Belt review on the basis of the 'Technical Report: Planning for Housing Growth in Knowsley' and the need to meet their objectively assessed housing needs. The findings of the Joint Employment Land and Premises Study (2010) also concluded that there was a shortfall of employment land in the Borough and four sites in the Green Belt would need to be released.
- 4 The release of Green Belt sites have been robustly assessed through the preparation of the 2010 Green Belt Study and Sustainability Appraisal of Green Belt Locations for Development. Overall we support the methodology adopted by the Council in assessing the release of Green Belt Sites but in some instances the presentation of the material could have been clearer and more concise for the reader. The Plan identifies the most appropriate and suitable Green Belt locations in the KLPCS such as the East Halewood and Edenhurst Avenue Sites, Taylor Wimpey and Redrow fully support the identification of the Site as being suitable for residential development. The Green Belt Technical Report ensures that the Plan meets the requirements of the Framework with regards to positively meeting its development needs and meeting the three dimensions of sustainable development (economic, environmental and social).
- 5 Knowsley Council has sub regional support for the preparation of its Green Belt Study. The Council prepared its Green Belt Study in

consultation with the neighbouring authorities of Sefton, West Lancashire and Knowsley. A Housing market partnership was also established between the three authorities. Halton and St Helens are in the process of preparing Green Belt studies and to assist with the duty to co-operate and overall consistency in the plan making process Knowsley Planning Officers have provided their methodology and worked with neighbouring authorities.

- 6 The Council has sought to demonstrate through the Green Belt Technical Paper and Green Belt Study how the other objectives of the Framework will be met with regards to the three dimensions of sustainable development (economic, environmental and social). These are provided in the Sustainability Appraisal and Suggested Mitigation Measures and the assessment proformas contained in the Green Belt Study.
- 7 If the Council does not release land from the Green Belt then they will be unable to meet their objectively assessed needs by not providing the minimum 3,076 dwellings to be accommodated in Green Belt locations. The Council states in its Planning for Housing Growth in Knowsley Paper (2013) that the totality of housing delivery projected for the period 2010/11 – 2027/28 is 9364 dwellings, including 6288 dwellings to be accommodated on urban land, and a maximum 3076 dwellings to be accommodated within Green Belt locations. An additional 386 dwellings are projected to be delivered in the two years following the conclusion of the plan period.
- 8 NLP have prepared a Housing Paper which identifies that to meet its objectively assessed needs KBC needs to provide around 500 – 600 dpa (See Matter 3). Therefore there is no doubt that Green Belt is required to accommodate the Council's housing needs.

3.3 Taylor Wimpey and Redrow consider that there is no justification for limiting the use of Green Belt to meet 'longer term needs'. It is considered that this approach is flawed and neither **justified** or **effective** for the following reasons:

Housing Land Supply:

3.4 The Council's Housing Position Statement indicates that there is an oversupply in the first 5 years (767 dwellings), an under supply of 58 dwellings in the 6-10 yr period and a shortfall of 1778 in the 11-15 yr period. The Council state that there is a combined shortfall of 1069 dwellings. Even on the basis of the Council's assessment there is a clear need to release Green Belt Sites for housing in the short to medium term to meet the Councils housing requirement. Taylor Wimpey and Redrow consider that there are a number of flaws with the Council's calculation of the housing land supply:

- 1 The Council have identified 5 sites that will contribute to the supply which have been longstanding allocations from the Knowsley Unitary Development Plan 2006. None of these sites benefit from extant

planning permission despite being allocation for over 7 years. Only one of the sites is currently subject to an undetermined planning application. Furthermore, the Council's own Housing Position Statement indicates that one of the 5 sites is unviable whilst three are considered to have marginal viability. Despite the foregoing, the Council consider that these 5 sites will deliver approximately 750 units over the plan period.

- 2 The Council have identified 1,295 dwellings in their 5 year supply which do not benefit from planning permission. This accounts for 43% of the supply. It is considered that these sites are at variance with the provision of Footnote 11 of the Framework and appeal judgements from the Secretary of State. To be included within the 5 year supply, the Council must provide sufficient evidence to justify that these sites have a realistic prospect of being delivered in the first 5 years.
- 3 By the Council's own admission, a significant proportion of the sites identified within the Housing Position Statement are either unviable or marginally viable. In total, almost 3,200 units (over half) are considered unviable or marginal using the Council's baseline viability assessment. Where viability is an issue on sites, it can often lead to protracted S.106 negotiations which have not been factored into the Council's assumptions. As a consequence, the certainty in relation to the viability and deliverability of these sites is highly questionable.
- 4 The Council's Housing Position Statement has not been the subject of consultation in conjunction with the Housing Market Partnership. As such, the development and delivery assumptions have not been endorsed by the relevant bodies. Consequently the Council could have overestimated the capacity and deliverability of certain sites.
- 5 The development phasing assumptions as identified on Table 3.11 of the Housing Position Statement are highly ambitious and at variance with recent experiences. The HBF indicates that developers on large sites are delivering approximately 25 units per annum and this cannot be multiplied on a pro-rata basis depending on the number of developers. Furthermore, on smaller sites the delivery per annum is likely to be significantly less.
- 6 The lead in times outlined in Table 3.11 are considered to be highly ambitious and Taylor Wimpey and Redrow Homes would like to express a degree of caution in relation to their application. In particular, it is considered highly ambitious that sites would start completing units within 6 months. This does not adequately consider the need for site mitigation, infrastructure requirements and building the units. A 6 month lead in time is considered a best case scenario but this should not be set as the average lead in time. This could potentially affect the delivery rates as set out in the Council's housing supply.

Housing Land Supply in Halewood:

3.5 Halewood is identified to deliver 19% of the overall housing requirement for Knowsley (1,539) in the KLPCS. Halewood only has sufficient urban land to accommodate 410 dwellings, which will meet its housing needs up to 2017 (assuming all identified sites come forward for development in this period). As such, a further 1,129 dwellings (minimum) will need to be accommodated in Halewood's Green Belt to meet its housing needs over the period to 2028. However, there are issues with the delivery of sites in Halewood:

- 1 The Township of Halewood failed to contribute to the delivery of housing over the 2012/2013 period. It is therefore questionable whether any urban sites in Halewood will contribute to the supply. UDP Housing Allocation H1 (Former Bridgefield Forum Site, Cartbridge Lane) has an estimated capacity of 250 dwellings in the Knowsley UDP. The Council's land release programme identifies that 150 dwelling will be delivered in 2014/2015 (Housing Position Statement 2013). However, it is constrained by flooding issues being located in Zone 3..
- 2 Halewood only has sufficient urban sites to meet its housing needs up to 2017 (this is based on the broad indicative distribution percentages set out in KPSCS Policy CS 3 and the total urban land supply set out in Table 11 of the Knowsley and Sefton Green Belt Study 2012). Many of these urban sites will not be deliverable, therefore Halewood is dependent on the release of Green Belt land to meet its short-term housing needs.
- 3 It is clear that the township area of Halewood has a consistent shortage of housing land, even with smaller annual targets. The Council acknowledges that a larger amount of land would be required to maintain Halewood's current proportion of the Borough's population due to there being a low level of existing commitments, allocations and SHLAA sites in Halewood.
- 4 There is therefore a need to release 'East of Halewood' from the Green Belt without delay, and to allocate the site for housing, to ensure the Council is able to adequately meet Halewood's future housing needs.
- 5 On the basis of the shortfall of land in Halewood there is a need to provide land in this location over the short-medium term. Given Halewood's key location in relation to major employers in the region such as Jaguar Land Rover (South Halewood), Liverpool John Lennon Airport and the Airport Business Park the need to bring forward the Halewood sites is greater. Land at Halewood is well related to the existing urban area and its development, as proposed, will contribute positively to the identified housing need.
- 6 The Council intends to bring forward a number of regeneration sites for housing. However, Policy CS 2 confirms that the Principal Regeneration Areas [PRAs] are located in Huyton, Kirkby and Prescot, some distance

away from Halewood (Huyton is the closest settlement, approximately 4km from Halewood). Halewood is neither identified as a PRA (under Policy CS 2) nor is it the target of any other urban regeneration activity in the Core Strategy. Given the lack of identified urban regeneration opportunities, combined with the identified housing need within Halewood, there is a need to bring forward the Halewood reserve locations for early development.

Housing Land Supply in Huyton

3.6 Policy CS3 of the Core Strategy confirms 33% of the Council's new housing stock will be delivered in the Huyton area, which amounts to 2,764 dwellings over the plan period. With regards to Huyton we comment as follows:

- 1 Remaining UDP sites within Huyton (sites H2 and H3) have capacity for 102 units and therefore it is evident that additional housing sites will need to be allocated as part of the Local Plan process.
- 2 It is also important to note that the North Huyton and Stockbridge Village area is identified as one of the Council's key regeneration areas in Part 6 of the KLPCS. The area has been subject to significant housing demolitions following the New Deal for Communities programme. However, many of these lost properties have yet to be redelivered.
- 3 Figure 5.3 of the Housing Paper suggests the available urban capacity within Huyton amounts to over 3,150 dwellings and therefore above the suggested quota. The vast amount of urban capacity within the area also relates to schemes permitted in the North Huyton Action Area, which we understand will be a priority for the Council to deliver.
- 4 The reserved Green Belt site located at Knowsley Lane (KGBS7) is located in close proximity to the regeneration area and therefore the phased release of this site later on in the plan period so as not to compromise the delivery of dwellings within the regeneration area make sense
- 5 The Edenhurst Avenue site (KGBS16), which is being promoted by Taylor Wimpey through Pegasus Group and via separate submissions, is located on the very outskirts of the much wider Huyton area and on the boundary with Liverpool City Council. It is sufficiently removed and small that it would not jeopardise the regeneration objectives and housing delivery within the North Huyton Regeneration Area. As set out in separate statements, the site is also part brownfield, offers no existing benefit to the community, food production or objectives of including land within the Green Belt. In light of this, there is no harm associated with releasing this site from the Green Belt for housing now to meet the Council's needs.

3.7 On the basis of the housing land supply issues identified Borough wide and in Halewood Taylor Wimpey and Redrow are concerned with the effective

implementation and delivery of sufficient housing sites over the plan period. Pegasus Group who are representing Taylor Wimpey on the Edenhurst Avenue Site have also prepared a detailed review of the Council's housing land supply position which demonstrates that when adopting the Sedgefield approach and 20% buffer the Council only has 1.96 years of deliverable housing land. It is clear that the East Halewood Site and Edenhurst Avenue Sites are needed now and should be allocated now to meet the housing land supply issues in the Borough in the short term.

- 3.8 Taylor Wimpey and Redrow consider that the only solution to maintain the Council's regeneration priorities and deliver housing over the plan period is to allocate Green Belt Sites such as East Halewood and Edenhurst Avenue now in the KLPCS.

Issue 2.5 – If the spatial strategy is considered unsound, what alternative strategy should be pursued and why? Is there any compelling evidence that the growth sought in the KLPCS could be achieved without requiring Green Belt land, and if so, on what basis?

- 3.9 Taylor Wimpey and Redrow Homes agree with the spatial distribution and methodology adopted by the Council in calculating the distribution as it would balance the size of population across the Borough. If an alternative strategy is to be pursued then additional growth should be accommodated in Halewood due to its close proximity to key employers of the Borough and the need to attract people to live in this part of Knowsley.
- 3.10 Taylor Wimpey and Redrow consider that the only way the Council can achieve its housing and economic growth requirements is through the release of land from the Green Belt. There is no other option than to release Green Belt land and to move away from this strategy is unjustified as there is no alternative location to accommodate future development needs. It is also considered that the proposed housing requirement of 8,100 dwellings should comprise the absolute minimum. Further details of the calculation of the requirement is considered in Matter 3 where it is proposed that a range of 500 – 600 dwellings per annum is provided over the plan period to deliver objectively assessed needs and meet economic growth. The Council has identified sufficient Green Belt land through the preparation of its evidence and have the ability to allocate sites such as East Halewood and Edenhurst Avenue now to come forward earlier in the plan period.

Issue 2.7 – What provision has been made in the KLPCS and associated documents for alternative strategies to be implemented if development does not come forward as envisaged? Do the policies include sufficient flexibility and contingencies to take account of unexpected changes and circumstances?

3.11 Taylor Wimpey and Redrow consider that no alternative strategies are available should development not come forward as envisaged. There is no flexibility or contingency if the sites in the urban area do not come forward as planned. The Council needs to allocated land from the Green Belt now to ensure a continuous deliverable supply of housing land. Taylor Wimpey and Redrow consider that the KLPCS is flawed as it is not **effective**.

3.12 In particular Policy CS5:

- 1 3a is not a test for the release of land as it merely states that first priority shall be given to the development of land in the urban area.
- 2 3b with regards to the timings of release must not undermine the Council's urban regeneration objectives including the delivery of programmes of regeneration is also not a test for the release of reserve locations. It is not clear how this can be delivered in reality.
- 3 3c does not provide sufficient clarity on the five year housing land supply position. There needs to be an appropriate release mechanism and monitoring of the 5 year housing land supply position and it should be provided by the Council through their annual monitoring reports. The policy as presently drafted does not provide a positive mechanism for boosting the supply of housing in accordance with the Framework [§47].

4.0 **Conclusions**

4.1 In summary, we conclude:

- 1 Policy CS1 and CS3 are unsound because Green Belt release is needed now to accommodate housing needs. The East Halewood Site and Edenhurst Avenue Site should be allocated for housing now to meet Knowsley's needs rather than be identified as a reserve location for housing.
- 2 There is no alternative option than releasing land from the Green Belt to deliver sustainable residential development and boost the supply of housing and meet economic growth aspirations.
- 3 Policy CS3 is not effective and does not provide sufficient flexibility and contingency should development not come forward as envisaged.