

## KNOWSLEY LOCAL PLAN: CORE STRATEGY

### KNOWSLEY METROPOLITAN BOROUGH COUNCIL

#### HEARING STATEMENT 5A

##### Matter 5 GREEN BELT

*Issue: Whether the selection of broad locations for development in the Green Belt is justified by the evidence and whether the mechanisms for release are clear and effective.*

##### Questions

**5.1 Is the statement in policy CS 5 that “inappropriate development will not be permitted in the Green Belt” consistent with national policy (which includes the ‘very special circumstances’ test)?**

5.1.1 In drafting policy CS5 the Council aimed to ensure that the integrity and openness of the Green Belt was maintained. However, it notes that there is an inconsistency between the submitted wording of clause 1 of CS5 and the ‘very special circumstances’ text at paragraph 87 of the NPPF. The Council would be happy to consider a main modification to this clause to clarify this point.

##### **Potential Main Modification\***

Amend policy CS5 clause (1) to read:

*“Inappropriate development will not be permitted in the Green Belt unless very special circumstances can be demonstrated, and the visual and recreational amenities of the Green Belt will be preserved.”*

**5.2 Is the methodology used to select broad locations robust? Does its complexity over-elaborate the assessment process and make it difficult to identify the critical determinants? Does the methodology enable proper value judgements about the relative importance of individual criteria to be made?**

5.2.1 The Council considers that the methodology to select Green Belt broad locations, as outlined in the Knowsley and Sefton Green Belt Study (EB08) and the Green Belt Technical Report (TR03) is robust.

5.2.2 The process of selecting suitable Green Belt locations for development is inevitably complex as it needs to appraise sites in the context of national Green Belt policy, as well as wider planning, regeneration and sustainability considerations and deliverability.

- 5.2.3 Figure 3.2 of the Green Belt Technical Report (TR03) presents the key stages of the methodology in diagrammatical form including those in the Green Belt Study (EB08) and Technical Report.
- 5.2.4 Table 4.3 of the Technical Report (TR03) draws together each strand of the process and presents the overall conclusion of the site assessment in relation to each Green Belt location considered potentially suitable for development.
- 5.2.5 The Green Belt Study (EB08) includes a comprehensive review of Knowsley's existing Green Belt and identifies land in the Green Belt that has the potential solely from a Green Belt policy perspective to be developed in order to meet future housing and employment needs.
- 5.2.6 The Study (EB08) was carried out by Knowsley and Sefton Councils using a draft methodology (published in December 2009) as a starting point. The draft methodology (Appendix 10, EB08) was independently validated by consultants (Envision) appointed to critically examine the work carried out by the two Councils at each stage of the Study.
- 5.2.7 The methodology adopts a staged approach, the aim of each stage being to discount those parts (referred to as 'parcels') of land in the Green Belt that must be kept open in order to maintain the integrity of the Green Belt, or which were found to be unsuitable for development.
- 5.2.8 Whilst the methodology used in the Green Belt Study (EB08) was primarily a 'sifting' process, discounting unsuitable sites at each stage, the Study allowed particular locations to be reconsidered where there was robust evidence (e.g. related to deliverability or wider sustainability benefits) to justify this.
- 5.2.9 For example "Cronton Colliery and adjacent land" (KGBS17) was drawn back into the Study at Stage 4a after previously being excluded. The inclusion of this site is supported by the Joint Employment Land and Premises Study (EB07) that highlighted the location's significant development potential (as summarised at paragraphs 7.22-7.33 of EB08).
- 5.2.10 As part of their validation role Envision facilitated two stakeholder workshops to test the draft methodology, and scrutinised the work carried out by Knowsley and Sefton Council's at the completion of each stage. The validation workshops included representatives from all neighbouring local authorities and statutory bodies including the Environment Agency, Government Office North West (GONW) and 4NW (the Regional Planning Body for the North West). GONW and 4NW have been subsequently abolished.
- 5.2.11 Further details of the validation process can be found in Envision's 'Final Validation Report' which forms appendix 11 to the Green Belt Study (EB08).
- 5.2.12 The Knowsley and Sefton Green Belt Study was carried out alongside a similar study for West Lancashire. The West Lancashire study was validated by Lancashire County Council and formed a key part of the evidence base

considered by the Inspector (Mr Roger Clews) at the Examination of the West Lancashire Local Plan in 2013. His report (dated 26 September 2013) (LC23b) concluded that site allocations which were based on the findings of the Study were soundly justified.

5.2.13 Halton and St Helens Councils are currently undertaking Green Belt studies to a similar methodology.

5.2.14 Although the Green Belt study (EB08) is considered to be robust, the Council has not relied solely on its findings. The Green Belt Technical Report (TR03) summarises how the Council has appraised the broader suitability of locations identified as potential candidate sites in the Green Belt study (EB08) and alternative sites put forward by representors. TR03 draws from the Sustainability Appraisal of Green Belt Locations (SD08/08a), the Strategic Flood Risk Assessment (Level 2), Transport Feasibility Study (EB10) and Transport Modelling Report (EB11).

5.2.15 Based on a summary of information gathered from infrastructure partners, the development industry and key landowners, the Technical Report (TR03) also concludes that the Council's selected Green Belt locations are deliverable from an infrastructure, economic and landowner perspective. This is confirmed by the Economic Viability Assessment (EB06) which finds that Green Belt locations have a significant financial development surplus across all parts of the Borough.

**5.3 There is significant (and not always consistent) repetition amongst the treatment of individual criteria within the commentaries of the KLPCS Strategic Objectives assessment (appendix 6 of Green Belt Technical Report (TR03)) – are the results of this process always as robust and clear cut as suggested?**

5.3.1 The Council sought to ensure consistency in the appraisals for each Green Belt location in Appendix 6 of the Green Belt Technical Report (TR03) wherever possible. In some cases the application of a consistent approach has resulted in a degree of repetition between the assessments of one of more locations.

5.3.2 In the Council's view, there is always likely to be a degree of consistency between the assessment of each location due to the similarity of sites being appraised and the strategic nature of the Core Strategy Strategic Objectives (SOs).

5.3.3 Differences between the assessments only become apparent where the development of different locations would have a clearly differing level of potential impact on specific SOs.

5.3.4 This is illustrated by the differing assessments for KGBS4: East of Knowsley Industrial and Business Parks and KGBS 3: Land at Boundary Lane. Both locations are located directly to the east of Knowsley Industrial Park and could deliver new employment land. However, the assessment identifies that

development in KGBS 3 would, due to its significant scale, be likely to have a detrimental impact on site delivery and regeneration within the existing Industrial Park. KGBS 4 is far smaller and is located within a gateway location which can contribute towards regeneration proposals, as evidenced by the Delivering a New Future for Knowsley Industrial Park – Strategic Framework (EB17). Further information regarding these two sites is set out in response to Question 5.15.

**5.4 Does the methodology ensure that an appropriate balance is achieved between Green Belt policy and the overall spatial strategy of the KLPCS? How has the relative priority between release of Green Belt land and development in areas at risk of flooding been determined, and has an appropriate balance been achieved?**

Balance between Green Belt Policy and Spatial Strategy

- 5.4.1 The methodology which has been used to identify the most suitable locations for development (see Question 5.2 above) has balanced the requirements of national Green Belt policy and the spatial strategy of the KLPCS.
- 5.4.2 The draft methodology for the Green Belt Study (Appendix 10 of EB08) refers in paragraph 5.1-5.10 to the need to consider the Core Strategy objectives at Stage 4. The format of this task changed due to feedback received during the validation process, and delays to the development of the Core Strategy. As a result the Green Belt Study (EB08) was finalised prior to the Core Strategy Strategic Objectives being available in their final (i.e. Publication version) format. To deal with this issue the Council re-considered this part of the assessment within the Green Belt Technical Report (TR03).

Consideration of Flood Risk

- 5.4.3 The Green Belt Study (EB08) outlines how flood risk issues have been considered in relation to the selection of Green Belt locations. As explained in paragraph 6.6 of the Study (EB08), Stage 3a of the methodology appraised each location remaining in the Study at that stage against a range of potential constraints to development arranged in three identified tiers.
- 5.4.4 Flood Zones 2 and 3 are identified as 'severely restrictive' and 'prohibitive / show stopper' constraints respectively (see Table 7: Grading of Constraints within EB08). This approach was informed by liaison with the Environment Agency. The grading approach differed depending on whether the location was being considered for housing or employment uses. This reflected guidance regarding the sensitivity of different land uses and the Sequential Test in paragraph 100 of the NPPF.
- 5.4.5 At Stage 3a of the methodology no sites wholly within Flood Zone 3 were still being considered for development, although some remained which were partly covered by Flood Zone 3. At Stage 4 (assessment of potential development capacity), the assumed developable area and indicative

development capacity identified for each location excluded land within Flood Zone 3.

5.4.6 The Strategic Flood Risk Assessment (SFRA) (Level 2) (EB15) was subsequently published in 2012 and complies with the NPPF (and associated Technical Guidance<sup>1</sup>). This assessed (in Volume 2 – Site Assessments of EB15) in further detail the nature of flood risk at the following Green Belt locations being considered for development:

- Bank Lane, Kirkby (KGBS1)
- Edenhurst Avenue, Huyton (KGBS16)
- East of Halewood (KGBS19)
- Cronton Colliery (and land south of M62) (KGBS17)

5.4.7 For each of these locations, the Strategic Flood Risk Assessment (EB15) identified potential developable areas for a range of development types assuming no mitigation measures were in place. The developable areas identified by EB15 as being 'Low Risk' and therefore suitable for all types of development were used to determine the capacity assumptions in the Green Belt Technical Report (TR03) and in the KLPCS. These 'Low Risk' zones excluded land in Flood Zone 2 (adjusted to account for the effects of climate change) and Flood Zone 3.

5.4.8 The indicative capacities for each Green Belt location identified in the Green Belt Technical Report (TR03) are therefore precautionary and robust. The Council acknowledges that further development capacity may be realised on some sites but only provided site-specific Flood Risk Assessments (FRAs) carried out at land allocation or planning application stages identify appropriate flood mitigation measures.

## **5.5 Many Green Belt sites involve loss of 'best and most versatile' (bmv) agricultural land. In the assessment has sufficient account been taken of the distinction between the different grades of bmv land?**

5.5.1 As required by paragraph 112 of the NPPF, the Council has taken account of the benefits of 'best and most versatile' (bmv) agricultural land and sought to use poorer quality land in preference to that of higher quality.

5.5.2 As discussed in response to question 5.4, Stage 3a of the Green Belt study (EB08) appraised the potential development constraints affecting each location.

5.5.3 The Provisional Agricultural Land Classification (ALC) maps provided by Natural England were used to identify bmv land in Knowsley. These indicate land quality at a strategic level but do not illustrate the breakdown of Grade 3 into sub-grades 3a and 3b. The dataset also has a minimum map unit of 80 hectares. Natural England advised the Council in 2012 that the dataset is not

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<sup>1</sup> Technical Guidance to the National Planning Policy Framework (CLG, 2012)

suitable for site specific assessment, for which a more detailed field survey is required.

- 5.5.4 A plan showing the Provisional Agricultural Land Classification Maps (MAFF, 1988) for Knowsley is available in the Examination Library (AD10). These maps have been supplemented by more detailed surveys of some priority locations in Knowsley undertaken between 1989 and 1999. This data was made available via the Natural England MAGIC website on 13 December 2011 (see examination library document AD20). In the Council's view, it would not be 'proportionate' in the context of paragraph 158 of the NPPF to undertake detailed field surveys as part of a borough-wide assessment such as the Green Belt Study (EB08). As the ALC maps do not differentiate between Grades 3a/3b, the Green Belt Study (EB08) adopted a precautionary approach whereby all Grade 3 land was assumed to be bmv. In addition, a consistent approach was taken using the MAFF 1988 ALC as the baseline. A "worst case" scenario was therefore used by the Council in assessing the impact of loss of bmv agricultural land to development.
- 5.5.5 Most of Knowsley's Green Belt was assumed in this way to be bmv agricultural land (as it mostly comprises ALC Grades 1, 2, and 3). If all of this type of land were to be ruled out in the Green Belt Study (EB08) and Technical Report (TR03) the Council would not be able to meet the Borough's housing and employment growth requirements. For example, as all the Green Belt surrounding Halewood is ALC Grade 3 or above, avoiding potential bmv agricultural land around Halewood would not allow for the identification of any options for future growth beyond those within the existing urban area.
- 5.5.6 For this reason the existence of Grades 1, 2 and 3 agricultural land was not included as a 'prohibitive' constraint but as a restrictive constraint which should discourage development if this would have an adverse impact on farm viability and food security, and where poorer quality agricultural land could be identified as suitable for development in the locality.
- 5.5.7 Whilst the NPPF (paragraph 112) makes it clear that bmv land should be protected where possible there are other sustainability implications that need to be considered such as the delivery of new homes and businesses in sustainable, suitable and accessible locations. The SA process, primarily through the Sustainability Appraisal of Green Belt Locations (SD08/08a), considers the wider sustainability considerations of each Green Belt location considered for development in TR03.
- 5.5.8 TR03 concludes on the basis of findings from the SA process (see documents SD07/07a and SD08/08a), that the negative sustainability impacts on a township and borough-wide scale of protecting all bmv agricultural land are so severe they would clearly outweigh the implications of releasing selective areas of agricultural land for development.
- 5.5.9 Whilst it was not possible to protect all bmv agricultural land in Knowsley, land to the east of Knowsley Industrial Park (KGBS 3) was rejected in TR03 due to

the negative implications of losing Grade 1 ALC and other sustainability and regeneration considerations.

**5.6 Policy CS 5 refers to specific “broad locations” being removed from the Green Belt, but also says that boundaries will be defined at Site Allocations stage. As detailed boundaries for the broad locations are mostly identified in the evidence base, why are they not delineated and released at KLPCS stage?**

- 5.6.1 The Council considers the approach in policy CS5 of identifying broad development locations with boundaries to be defined at a later stage to be sound. The approach is consistent with paragraphs 47 (3<sup>rd</sup> bullet) and 157 (4<sup>th</sup> bullet) of the NPPF.
- 5.6.2 This is particularly appropriate as there is adequate provision of available and deliverable land supply to meet development needs in the early years of the Plan period as evidenced by the Housing Position Statement (SD22) and Employment Position Statement (SD23). For example Knowsley currently has ca 6.7 year deliverable housing land supply (see response to Question 3.13).
- 5.6.3 The approach of allocating the Green Belt release locations at a later stage is consistent with the strategy in clause 1(a) of policy CS1 which is to prioritise urban sites and delivery of regeneration priorities. The approach meets the requirements of the NPPF (paragraph 21 and 47) including the current requirements for an additional 20% buffer of deliverable housing sites.
- 5.6.4 The Council's Housing Trajectory (KLPCS Figure 5.1) highlights that the Council expects to be able to demonstrate an adequate supply of deliverable housing land until 2018/19, thus triggering Green Belt release at this point. The Council intends to complete the site allocations process well in advance of this date to enable this to happen.
- 5.6.5 Policies CS4 and CS 5 of the KLPCS seek to identify sufficient land for employment up to 2028; maintain at least a five year supply of available and deliverable sites and premises at all times; and also maintain a suitable range of sites and premises by size, location, type and suitability for employment uses to support needs and specific requirements. Whilst the Employment Position Statement (SD23) suggests there is up to a 16.7 year current land supply, excluding flexibility and under delivery, Green Belt release may be needed sooner based on the need for a suitable range and choice of sites. However it is not likely that this release will be needed before the site allocations process is completed. This is noting that the supply of employment land and premises identified within the Employment Position Statement (SD23) includes a suitable range and choice of available sites in terms of both location and type to accommodate employment development requirements in accordance with policy CS4 clause 4.
- 5.6.6 The approach also allows for flexibility to take account of any new evidence which may emerge to inform the site allocations process. The larger site allocations (such as land to the south of Whiston (KGBS14) and east of

Halewood (KGBS19 and 20)) are likely to be linked to detailed policies on matters such as phasing and site specific development requirements. In the case of land at Knowsley Lane, Huyton (KGBS7) and Carr Lane, Prescot (KGBS10) the site allocations process is expected to provide further guidance concerning mixed or flexible uses. This could cause significant delay if added at this stage to the Core Strategy process.

**5.7 How will the phased release of Green Belt sites operate in practice? Is the main driver of release the maintenance of a 5 year land supply (clause 3c of policy CS 5), or will urban regeneration objectives (clause 3b of policy CS 5) also have a role and if so, what will this be? Is it necessary to include the reference to meeting longer term development needs?**

5.7.1 Following the adoption of the KLPCS the "reserve" locations identified in paragraph 5.50 will remain in the Green Belt until allocated for development in the Local Plan: Site Allocations and Development Policies (KLPSADP) document. The Council's Local Development Scheme (PP10) indicates that this will be adopted in December 2015) at which point the locations will be removed from the Green Belt. After this point, the Council will assess planning applications for development in these locations subject to the phasing and other requirements of policy CS5.

5.7.2 Clause 3 (a) of policy CS5 gives first priority to developing land in the existing urban area whilst clause 3(b) establishes that the timing of the release of the Green Belt locations must not undermine urban regeneration priorities in Knowsley and the wider sub-region. This approach including the reference to "longer term development needs" in clause 2 of the policy is consistent with the principles of sustainable development and the spatial strategy in policy CS1 (clause 1). The prioritisation of previously developed urban sites is also consistent with the NPPF (paragraph 17, 8<sup>th</sup> bullet).

5.7.3 When the Green Belt study (EB08) was being developed it was concluded that it was difficult to assess potential sites for removal from the Green Belt against Purpose 5 of including land within the Green Belt (NPPF, paragraph 80) '*to assist in urban regeneration by encouraging the recycling of derelict and other land*'. The rationale for this conclusion (see paragraph 5.10-12, EB08) is that the impact the development of a specific location may have on regeneration priorities would depend largely on the details of a proposed scheme at planning application stage.

5.7.4 To select appropriate sites that would not undermine regeneration at the outset would also have made make the KLPCS overly restrictive and inflexible. It was therefore considered more appropriate to include provision for this assessment in policy CS5.

5.7.5 In its representations on the Knowsley Core Strategy Preferred Options Report (CS04), Liverpool City Council raised concerns regarding the impact that Green Belt release in Knowsley may have on regeneration in the wider

Liverpool City Region (see AD06). These concerns have been addressed by policy CS5 clause 3 (b).

- 5.7.6 Policy CS5 aims to ensure the release of Green Belt locations will avoid undermining urban regeneration whilst also enabling an adequate supply of land for development to be maintained.
- 5.7.7 The maintenance of appropriate deliverable housing and employment sites is however the main driver of release in policy CS5. In the case of housing this is primarily linked to the maintenance of a 5 year supply plus buffer as required by the NPPF. In the case of employment it is linked to a 5 year supply of deliverable sites plus an adequate range of sites by site size, location and suitability. In determining any specific planning application where these triggers apply the Council will give significant weight to these issues whilst also assessing the impact that the proposal may have on regeneration priorities. It may also consider whether any evidenced deficit in land supply could be addressed in any one of the alternative 'reserved' locations.
- 5.8 Is there sufficient clarity in the KLPCS over the mechanism for the release of individual Green Belt sites – how will the relative order of release be determined? Why are the individual broad locations not identified in policy CS 5?**
- 5.8.1 The Council's approach does not set out the relative order in which individual Green Belt sites will be released. If such an approach were to be adopted, the Council could experience a scenario where delivery of new development could be impeded by slow delivery of one particular site if it were to stall or become unviable. This approach would also be overly restrictive and be inconsistent with the requirements of the NPPF (e.g. in paragraph 17, 3<sup>rd</sup> bullet) to promote and respond to opportunities for growth.
- 5.8.2 The Council may however withhold the granting of permission if it considers for example that a specific proposal will adversely impact on regeneration priorities.
- 5.8.3 Clause 3 d) of CS5 outlines that planning permission for employment uses will be granted when it is necessary to maintain a range of sites. In this scenario, notwithstanding the overall quantum of supply available, if an applicant could evidence that their proposal could only reasonably be located on one particular Green Belt site the Council may be minded to approve the scheme.
- 5.8.4 It is not necessary to identify the broad locations in the wording of policy CS5 as paragraphs 5.50 and 5.51 are already referred to in clause 2 of the policy. Listing the locations in CS5 would not improve the operation of the policy.
- 5.8.5 The listing of the locations at paragraphs 5.50 and 5.51 respectively rather than in the policy itself could also allow greater flexibility for the proposed land uses within specific locations to evolve as circumstances and needs change following adoption of the Plan.

5.8.6 For example, whilst KGBS10 (Carr Lane, Prescott) is currently identified as being either for housing or employment uses the choice of which of these uses would most appropriately be taken forward is likely to depend at least in part on whether an existing outline planning permission<sup>2</sup> for predominately residential development on adjacent existing employment land in the South Prescott Principal Regeneration Area is implemented. The Council's existing approach will ensure flexibility and therefore be consistent for example with paragraph 157 of the NPPF.

**5.9 Is the approach to safeguarded land in policy CS 5, which does not rule out development before 2028, consistent with national policy which requires safeguarded land to be released through the Local Plan process?**

5.9.1 Whilst the Council considers that adequate land has been identified to meet needs up to 2028, the Council has been mindful of the NPPF advice that Plans should be flexible and able to cater for unforeseen circumstances.

5.9.2 The advice in paragraph 85 (bullet 4) of the NPPF that permission for permanent development of safeguarded land should only be granted following a Local Plan review has been considered. However, such an approach in the case of Knowsley was deemed on balance to be overly restrictive. Notwithstanding the significant 'headroom' in identified capacity (see Table 5.2 of CS01 and Question 5.10 below), the Council's existing approach provides a further flexibility measure and contingency should the delivery of development fail to meet targets for housing development up to 2028.

5.9.3 For example, if development in one or more of the very large "reserve" locations at South Whiston or East Halewood fail to proceed as quickly as envisaged the release of the safeguarded location at Knowsley Village could potentially be necessary (albeit probably late in the period to 2028) to ensure delivery during the Plan period. Given that this is a highly unlikely but still possible scenario the Council considers it necessary to make contingency provision in this way. The acknowledged inconsistency with paragraph 85 of the NPPF therefore needs to be balanced against the need for flexibility in meeting Plan period development needs as set out in paragraphs 21 and 157 of the NPPF.

**5.10 KLPCS table 5.2 indicates that the potential supply/capacity of the broad locations proposed for Green Belt release substantially exceeds the potential shortfall to 2028. Given the importance of retaining as much Green Belt land as possible, is this potential over-allocation justified?**

5.10.1 In accounting for development requirements over 15 years as advised by the NPPF (paragraph 157) the KLPCS must be flexible and able to accommodate a range of economic conditions (NPPF, paragraph 21). To provide this flexibility the KLPCS (as explained at paragraph 5.49) provides sufficient 'headroom' in quantitative terms for both housing and employment provision.

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<sup>2</sup> Permission reference: 11/00385/OUT

- 5.10.2 In relation to housing this "headroom" is 1,446 dwellings. Whilst this could theoretically constitute a degree of oversupply for housing development some of this capacity is currently assumed to be delivered beyond the Plan period. Table 10.3 of the Planning for Housing Growth Technical Report (TR01) estimates that 386 dwellings will be delivered in 2028/29 and 2029/30, including 257 dwellings from the Green Belt locations. Taking account of this housing delivery post plan period, the currently identified capacity represents a net 'headroom' of 1,060 dwellings.
- 5.10.3 In relation to employment, the potential supply of 235.4 hectares (rounded)<sup>3</sup> from all sources identified in table 5.2 represents a headroom of 62.9 hectares (rounded)<sup>4</sup> or 36% above remaining plan period requirements. It is not realistic however to assume that the entire current or potential employment land supply identified in the KLPCS tables 5.1 and 5.2 will be delivered during the plan period. This is based on evidence of historic trends whereby a surplus of available supply has always remained. The Council therefore expects that flexibility in terms of the overall quantity of available land will need to be substantially greater than the illustrative minimum requirements identified in KLPCS table 5.1, even before an appropriate supply buffer to account for maintaining a suitable range and choice towards the latter part of the plan period and post plan period needs is considered (as required by policy CS4 clause 4). This is noting a degree of uncertainty regarding the extent of remodelling that is likely to be deliverable during the plan period, and the possibility of losses of existing employment land supply. Further explanation regarding employment land requirements and the need for Green Belt release is included in the Council's responses to Matter 4 (particularly Question 4.7).
- 5.10.4 Some of the sites being brought forward by the KLPCS are of significant scale. In the context of housing, the Principal Regeneration Areas (PRAs) have a gross capacity for between 300 – 1,450 dwellings. The locations for longer term Green Belt release at East of Halewood (KGBS19) and South of Whiston (KGBS14) are also large having a capacity for 1,124 and 1,532 dwellings respectively. Whilst the Council's evidence demonstrates that these proposals are mainly deliverable before 2028, there is always some risk of individual schemes stalling or failing for example due to viability issues or less favourable economic circumstances. The KLPCS allows for sufficient contingency should one or more of these significant sites not come forward as quickly as anticipated.
- 5.10.5 The Council's approach also allows for flexibility in the Plan should specific sites currently identified as having potential for mixed and/or flexible land

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<sup>3</sup> Current supply: 170.2 hectares (rounded), potential remodelling 22.9 hectares (rounded) and reserved Green Belt locations of 42.4 hectares (rounded). Use of assumption for residential / employment splits in Technical Report: Green Belt (TR03), rather than maximum figures in Employment Position Statement (SD23).

<sup>4</sup> Headroom = Potential supply - Plan period requirements: (183.5 hectares – 11.0 hectares delivery = 172.5 hectares)

uses, such as Carr Lane, Prescott (KGBS10) and Knowsley Lane, Huyton (KGBS7), come forward with a cumulative emphasis on one particular land use which places a pressure on the delivery of housing or employment land elsewhere.

5.10.6 Whilst selecting appropriate Green Belt locations for development the Council has sought to identify where the existing Green Belt boundary can be logically relocated to a position that is robust and defensible, using appropriate physical features where available. This is consistent with the requirements of the NPPF (paragraph 85 (6<sup>th</sup> bullet)). As a result of this process, some Green Belt locations are potentially slightly larger than the Council would have identified had this requirement not been in place.

5.10.7 The Council's adopted approach also allows for flexibility should a requirement for a gypsy and traveller site need to be identified from the Green Belt at KLPSADP stage (see response to Question 5.12 below).

**5.11 Is the approach to major developed sites in the Green Belt in policy CS 5 consistent with national policy, which allows limited infilling and redevelopment of all previously-developed sites? Is it appropriate to continue to regard King's Business Park as a major developed site in the Green Belt?**

5.11.1 In the Council's view, the approach to Major Developed Sites (MDS) in the Green Belt, as outlined at clause 7 of policy CS5 is consistent with the principles of the NPPF. Whilst the NPPF (at paragraph 89, 6<sup>th</sup> bullet) does not refer directly to MDSs, the principle of infilling and/or redevelopment is consistent with that of clause 7 of policy CS5. In this respect, the Council considers that benefits remain in terms of the effectiveness of the KLPCS in offering flexibility for the identification of major previously developed sites within the KLPSADP to which NPPF (paragraph 89, 6<sup>th</sup> bullet) applies. However it is accepted that the continued reference to 'Major Development Sites' could be misleading. Therefore in the interest of clarity the following potential modifications to the policy and supporting text are suggested.

**Potential Main Modification\***

Amend policy CS5 clause 7 to read:

**Major Existing Previously Developed Sites in the Green Belt**

*"7. Major ~~Existing~~ Previously Developed Sites in the Green Belt will be identified in the Local Plan: Site Allocations and Development Policies, where limited infilling and redevelopment will be considered appropriate in principle."*

**Potential Additional Modification\***

Amend paragraph 5.58 to read:

***“Existing Previously Developed Sites within the Green Belt***

*5.58 The Council wishes to allow appropriate future development within previously developed sites in the Green Belt provided the openness of the Green Belt is preserved. Such sites vary widely in type and size and smaller sites may not be identified specifically on the Policies Map. There are However a number of existing previously developed sites in Knowsley's Green Belt. These include including Kings Business Park and several sites used for operational needs by utility companies are of a major scale. The Council intends to identify these major sites in the Local Plan: Site Allocations and Development Policies, which may also include detailed policy guidance regarding new development within them. The Council wishes to allow appropriate future development within these areas provided the openness of the Green Belt is preserved. These sites, together with detailed policy towards new development within them, will be identified in the Local Plan: Site Allocations and Development Policies.*”

- 5.11.2 The importance of the above approach is justified by the Council currently having a ‘saved’ policy within the Knowsley Replacement Unitary Development Plan (PP01) relating to Major Developed Sites in the Green Belt. In the Council’s view, Policy G5: Existing Major Developed Sites in the Green Belt has been successful in enabling development in appropriate sites. A prime example of the policy’s success is illustrated by the development of Kings Business Park where a brownfield site has been redeveloped and a primarily green and open setting has been preserved alongside a successful high quality business park.
- 5.11.3 On this basis, the Council sees no need to alter an already successful approach, and proposes to retain ‘saved’ UDP Policy G5 until it is replaced by a successor policy within the KLPSADP which is consistent with the modified policy CS5 clause 7.
- 5.12 Is it likely that land for gypsy and traveller provision will need to be found from within the Green Belt and, if so, should the Green Belt policy reflect this?**
- 5.12.1 There is currently no evidence that accommodation for gypsies and travellers will need to be provided on land currently within the Knowsley Green Belt.
- 5.12.2 The evidence on the needs for gypsy and traveller accommodation is currently being reviewed (see Statement 7, question 7.6). The Merseyside Gypsy and Traveller Accommodation Needs Assessment (LC04) identified a need for just 5 permanent pitches within Knowsley and a further 10 transit pitches shared among Knowsley, Liverpool, Sefton and Wirral. This or a similar level of provision is likely to be capable of being accommodated within

the urban area. In the event that this is not practicable, it should be noted that policy CS5 would not restrict the use of locations being removed from the Green Belt to accommodate housing to settled residential communities only. The 'headroom' in land supply (as discussed in response to Question 5.10) is more than sufficient to account for such provision if required. As noted in the Council's statement on matter 7, this issue will be addressed in more detail within the KLPSADP.

**\* Note regarding modifications**

*The suggested potential modifications to the KLPCS set out in this statement are put forward to assist the consideration of this matter at the hearing sessions. These and any other potential modifications would need to be approved by the Council's Cabinet and undergo formal public consultation before being considered for inclusion in any version of the KLPCS which is finally adopted.*