



**Knowsley Local Plan: Core Strategy Examination  
(Reconvened Examination Hearings 2-4 June 2015)**

## **Written Statement Relating to Matter 3**

Representor I.D. 73

In respect of  
**Land off Fox's Bank Lane, Whiston**

May 2015

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# 1 Introduction

## 1.1 Purpose

This Written Statement has been prepared by Frost Planning Ltd in connection with the Examination of the Knowsley Local Plan Core Strategy ('KLPCS') and the 'Reconvened Examination Hearings' which are due to take place on 2 - 4 June 2015.

This Written Statement principally addresses the Inspector's Matter 3 (New Matters Arising Since July 2014 Hearings) and the specific questions (3.1 – 3.5 inclusive) raised in the Inspector's Agenda.

Frost Planning previously made written representations to the 'Proposed Submission' stage of the KLPCS in 2012 and attended the hearing examination in 2014. We note from the Inspector's Note (EX39) and the Guidance Note (EX04) that there is no need to repeat arguments previously made as the Inspector will give full weight to written representations made at the Proposed Submission stage and during the initial hearing examination. Therefore, this statement purely addresses new matters and specific questions set out in the Inspector's Agenda. However, we reserve the right to respond verbally to any additional new matters, questions or evidence raised at the forthcoming hearings.

## 1.2 References

This Written Statement relies upon and should be read in conjunction with the documents constituting the 'Examination Library'.

## 2 Matter 2 - Legal Compliance and Procedural Matters

### 2.1 Question 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?**

For the avoidance of doubt, Frost Planning has no comments to make regarding Matter 2 (Legal Compliance and Procedural Matters) raised by the Inspector other than to note that EX37 (Council Note on Consultation Processes, January 2015) provides a clear account of the consultation which has been undertaken at all previous stages of the KLPCS and demonstrates that they have met and exceeded the statutory requirements.

## 3 Matter 3 – New Matters Arising Since July 2014 Hearings

### 3.1 Question 3.1

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

On 27 February 2015, the Department for Communities and Local Government (CLG) published the 2012-based Sub-National Household Projections. These projections set out, on a local authority basis, the projected changes in the number of households over a 25 year period. The 2012-based household projections replace the 2011-based interim projections. On 10 March 2015, CLG published a further statistical release as part of the 2012-based Sub-National Household Projections. This included detailed data for modelling and analytical purposes.

Frost Planning has considered the latest projections but does not consider there are any implications for the KLPCS emanating from the new household projections for the main reasons set out below.

- This latest data on household projections does not represent the Objectively Assessed Need (OAN) for housing in Knowsley. It purely relates to new household projections and is therefore simply a 'starting point estimate' which needs to be considered alongside other factors in accordance with Planning Practice Guidance (PPG).
- The 2012-based household projections suggest growth of 258 households per year over the period 2012 – 2028 in Knowsley. However, this is comparable to the 2011-based interim household projections which the KLPCS has already taken into account in arriving at its minimum target figure of 450 dwellings per annum.
- By reference to the Planning Advisory Service (PAS) Technical Note on 'Objectively Assessed Need and Housing Targets' published June 2014, such household projections are trend-driven. They roll forward rates of birth, death, migration and household formation from a past period (the 'base period') into the future. There are several reasons why this may be flawed and does not provide a true picture of housing demand or need. These are:
  - The projections might be technically flawed. This could be due to inaccurate historical data or the projections may not have caught up with the latest available data. This cannot be discounted in the case of Knowsley.
  - The projections may be skewed by exceptional market conditions over recent years. This is highly likely given the severe economic recession experienced both nationally and locally between 2007/2008 and 2012. This is very likely to have suppressed evidence of demand for housing due to steeply rising unemployment levels and poor mortgage availability during this 4/5 year period.
  - The housing projections may not have been accurately adjusted to reflect the past under-provision of housing. Where planning has underprovided land against demand or need, past development – and hence past population and household growth – will also have fallen short of that demand or need. By the same token, since projections roll forward that past growth into the future, they will understate future demand or need – and therefore should be adjusted upwards. We doubt whether this pent-up need or demand has been taken into account in the latest household projections.

- The key drawback of over-reliance on the CLG household projections is that they only estimate the number of homes that would be needed for future households should recent economic trends continue. The projections assume that the external (non-demographic) factors that drive demographic change will be the same as they were in the past (base period). But in reality in Knowsley these factors are likely to change in the future. Nationally, for example, the macroeconomic climate is significantly improving and there is a national policy shift towards the creation of a 'Northern Powerhouse'. Locally, this should result in significantly more inward investment and local job opportunities. Indeed, achieving a step change in the borough's local economy is a clear ambition of the KLPCS which is in turn supported by national planning policy.
- Planning policy in neighbouring areas is becoming more restrictive due to the exhaustion of urban capacity in areas such as St Helen's, shifting demand across administrative boundaries to Knowsley. The household projections do not take such local policy circumstances into account.
- The household projections of +258 households per year hides a significant and worrying fall in projected population growth due to net 'out' migration, particularly in relation to the borough's working age groups. We note that paragraph 3.4.2 of the Council's Matter 3a Statement to the Hearing in 2014 confirms that the provision of 466 dpa will provide +44 jobs per annum in Knowsley, increasing to +266 jobs per annum on the basis of 575 dpa. We note that the Council in a subsequent paragraph (3.4.4) of its Matter 3a Statement state that 11,390 jobs could be created in Knowsley by 2028. To achieve anything like this number of jobs the KLPCS needs to match job growth with housing supply. Existing businesses in the borough and potential inward investors will otherwise choose to local elsewhere where there is a more reliable labour supply. Out migration must therefore be stemmed and reversed if possible in Knowsley if the borough is to achieve its jobs growth target. A minimum housing target of 450 dpa would help to achieve this. However, this level of housing proposed is very much a minimum. There is no suggestion in the NPPF that it should be treated as a maximum.
- In setting its OAN the KLPCS should also have regard to the impact of housing development on its wider policy objectives and priorities. This is not just confined to creating more jobs. Housing development impacts on community well-being. Too little housing in Knowsley based on household projections alone can cause harm – for example from excessively ageing communities, out-migration due to lack of housing and choice, loss of critical mass to support town centres or rail stations, vacant shops and wastefully under-used schools.

In summary, whilst Knowsley is currently one of the most deprived local authority areas in the country (Index of Multiple Deprivation (IMD) 2007 ranks Knowsley as the fifth most deprived in the country), this can change. The KLPCS should become a force for change through planning for growth rather than accepting the status quo. By rigidly applying household projections which reflect past trends, this change will not occur as too little housing will be built. Instead, the KLPCS must take a more proactive and positive view on the borough's future by increasing the housing target figure to at least 450 dpa in order that this will manifest in significant and sustainable economic growth over the plan period and beyond.

In conclusion, we consider that the 2012-based household projections should not alter the Inspector's initial findings on the objectively assessed housing needs of Knowsley.

### 3.2 Question 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?**

To date the Council has not published any other new evidence which materially affects the assessment of housing need.

There has not been any updated Strategic Housing Market Assessment produced.

In terms of market signals, there has been a continued increase in economic activity and an upturn in housing delivery/prices both nationally and regionally since the hearing in 2014. We expect this is being reflected in Knowsley and signals a positive economic outlook providing planning policy does not act as an undue restraint on this growth.

We reserve our right to comment further on any new evidence which the Council may present to the hearings in June.

### 3.3 Question 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?**

To date the Council has not published any new evidence which materially affects the assessment of housing land supply. We reserve our right to comment further on any new evidence which the Council may present to the hearings in June.

### 3.4 Question 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**

The Ministerial Statement on 4 October 2014 relates to development control matters and is not a matter for plan-making.

With regards to the PPG revisions on 6 October 2014 and the question of whether housing and economic needs override constraints on the use of land, such as Green Belt, the PPG remains clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole, or specific policies in the NPPF indicate development should be restricted. Such policies include land designated as Green Belt. However, the Council has clearly assessed the case for releasing Green Belt on this basis and determined that there are overriding housing, social and economic benefits of doing so – i.e. there are *exceptional circumstances*. The KLPCS (Proposed Modifications) reflects this.

With regards to another PPG revision on 6 October 2014, the issue of whether unmet need for housing can outweigh Green Belt Protection is addressed. It states that “Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.” Crucially, however, this statement is made in the context of the test when determining planning applications and not reviewing local plans.

In summary, there are no implications of the Ministerial Statements and PPG revisions for the KLPCS.

**b) Sustainable drainage systems**

No comment.

**c) Housing standards**

No comment.

**d) Affordable housing site-size thresholds**

No comment.

**e) Housing for older people**

No comment.

**f) Planning obligations?**

No comment.

**g) Question 3.5**

**Are there any other new matters relevant to the KLPCS?**

Frost Planning is unaware of any other new matters which are relevant to the KLPCS. However, we reserve the right to comment further should such matters arise at the hearing.

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