

KNOWSLEY CORE STRATEGY EXAMINATION

MATTER 9: SUSTAINABILITY, DESIGN AND QUALITY OF NEW DEVELOPMENT

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ON BEHALF OF JUNCTION PROPERTY LTD
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Housing Size and Design (CS17)

1. Question 9.1: Mix of Housing.

- 1.1 JPL does not object to the CS providing guidance on the mix of dwellings sizes that may be required in the plan period provided adequate account is taken of demand and impact on viability. However it is unclear how the Council would seek to implement Policy CS17 clauses 1-3 for individual proposals.
- 1.2 House builders will only build homes where there is a demand for that particular type of housing on that particular site. If they consider that housing will not sell, they will not build it. This is especially true in Knowsley where there are many areas where there is no market for large 4 bedroom houses or apartments for sale. As a result, great flexibility will be required by the local planning authority if Policy CS17 Clauses 1-3 is not to hamper much needed house building activity. This flexibility needs to be incorporated into the policy by reference to demand and viability.
- 1.3 The best way of achieving the mix sought by Policy CS17 and Table 7.1 is to ensure that the housing supply contains a significant number of larger sites which are capable of providing a full range of housing, including sites in high demand areas where 4+bedroom houses can be provided in significant numbers.

2. Question 9.2: Building for Life and Lifetime Homes

- 2.1 JPL considers that Clause 4 of Policy CS17 should be amended so that it encourages developers to meet the specified design standards rather than requires it. These are not mandatory nationally, and the Council has not set out any evidence, compelling or otherwise, why they should be in Knowsley.

3. Question 9.3: Impact on Viability

- 3.1 The Keppie Massie Viability Study (EB06) shows that the proposed design standards would significantly harm viability of many sites in at least two of the three parts of the Borough (Tables 7.30, 7.31 and 7.32). By itself this would be contrary to national policy

(NPPF (173)). However national policy also makes clear that the impact of standards should not only be assessed individually but also cumulatively (NPPF (174)). If the individual impacts of the relevant policies including CS17 are added together, most development proposals within the urban area of Knowsley would be unviable.

4 Question 9.4: Future Proofing

- 4.1 The Government is currently consulting on its approach to housing standards. It has made clear its opposition to a proliferation of local standards (such as contained in Policy CS17). Its current preferred approach is to set out "*nationally described standards*" which could be adopted through local development plans and neighbourhood plans. However, it also emphasises that the adoption of any particular standard will be dependent upon passing tests of "*direct justified local need*" and viability.
- 4.2 The alternative approach being consulted on by the Government is to incorporate the "*nationally described standards*" into Building Regulations which would remove them entirely from the planning arena.
- 4.3 The only way in which Policy CS17 can be future-proofed against these potential changes is if it becomes one of encouragement to meet standards rather than requiring it.

Design Quality

5 Questions 9.5 to 9.6: Development Risks

- 5.1 These are matters initially for the Council.

Sustainable Development

6 Question 9.7: Future Proofing of Policy CS22

- 6.1 Similar to our answer to Question 9.4, Policy CS22 can only be "*future-proofed*" in respect of likely changes to national policy by making it one of encouragement to meet standards rather than requiring it.
- 6.2 If the Government does introduce "*nationally described standards*", the current consultation makes clear that they should be introduced through a review of the Local Plan.

7 Question 9.8: Policy CS22 Clauses 3 and 4

- 7.1 If Clauses 3 and 4 of Policy CS22 is intended only to encourage the specified standards to be met, Clause 5 should not require that applicants to have to demonstrate why it is not feasible to meet them. As it stands, Clause 5 is a backdoor way of making the standards mandatory which would be contrary to national policy.

8 Question 9.9: Policy CS22 Clause 7

- 8.1 Any requirement for decentralised renewable and low carbon energy systems would have major implications for the viability of development schemes. To our knowledge, these have not been factored into the Viability Study.

9 Question 9.10: Policy CS22 Clause 10

- 9.1 It is contrary to national policy for a development plan document to delegate criteria to a supplementary planning document which are to be used to determine planning applications (NPPF 154 and 174). All such criteria should be within the Local Plan.