

KNOWSLEY LOCAL PLAN:  
CORE STRATEGY EXAMINATION

Withdrawal of Representations – 21 October 2013

**Part 1**

Email from Cass Associates confirming withdrawal of representations for Mr R Buckley (Redrow Homes) (ID: 90, response: 1090)

**Part 2**

Email from Cass Associates confirming withdrawal of representations for United Utilities in relation to Alternative Site D at Lydiate Lane (ID: 127, response: 1127)

**Part 3**

Email from Cass Associates attaching map of land in United Utilities Ownership at Alternative Site D at Lydiate Lane.

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**From:** Peter Hamilton [REDACTED]  
**Sent:** 15 October 2013 10:30  
**To:** Programme Officer  
**Cc:** Robin Buckley  
**Subject:** Knowsley Local Plan Core Strategy

**Importance:** High

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

REFERENCE EML-OUT/1154/E/21  
For the attention of Programme Officer

**FAO: Paul Morris, Programme Officer**

**RE: Representations by Cass Associates on behalf of Redrow Homes (Mr Robin Buckley)**

Further to our recent telephone conversations I wish to confirm the withdrawal from our appearance at the Examination Hearing Sessions (Matters 2, 3 and 5) and also the withdrawal of previous written submissions made on the Proposed Submission Document.

Below is a copy of an e-mail providing my client's ID No (90), response reference (1090) and the references to the issues raised (1090.1, 1090.2, 1090.3, 1090.4). For completeness I enclose a copy the representations made (taken from the Council's Report SD02).

Please would acknowledge receipt and that the Inspector will be advised of our withdrawal?

Should you have any queries please do not hesitate to contact me?

Regards

**Peter Hamilton**  
**Partner**




[REDACTED]

[www.cassassociates.co.uk](http://www.cassassociates.co.uk)

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Please note that neither Cass Associates nor the sender accepts any responsibility for viruses and we strongly recommended that you scan attachments (if any).

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-----Original Message-----START

Forwarded by Peter Hamilton [REDACTED] on Tue 15th Oct 2013

**From:** Usher, Sianne [REDACTED]  
**Sent:** 22nd Jul 2013 at 15:10 (GMT+01:00)  
**Received:** 22nd Jul 2013 at 15:17 (GMT+01:00)  
**To:** Peter Hamilton [REDACTED]  
**Subject:** Knowsley Local Plan Core Strategy - Submission to the Secretary of State  
**Attachments:** image001.jpg; image002.jpg; image003.jpg; image004.jpg; image005.jpg;  
**Importance:** Normal

**PLEASE DO NOT REPLY DIRECTLY TO THIS EMAIL ADDRESS PLEASE USE  
[PROGRAMMOFFICER@KNOWSLEY.GOV.UK](mailto:PROGRAMMOFFICER@KNOWSLEY.GOV.UK)**



Paul Morris – Programme Officer

Our Ref: Local Plan  
Submission  
Date: 19 July 2013

**Please contact:**  
**Tel No:**  
**Email:**

0151 443 3077  
programmeofficer@knowsley.gov.uk

Cass Associates

Dear Mr Peter Hamilton

**RE: Knowsley Local Plan Core Strategy – Submission to the Secretary of State**

**Your Client: Redrow Homes Mr Robin Buckley**

I am writing to update you on progress with the Knowsley Local Plan Core Strategy following your response on behalf of your client to the consultation on the Plan in 2012. Following the closure of the consultation period on 21 December 2012, the Council has collated all responses received including your own. Each respondent and response to the Plan has been formally registered. The details of your registered responses are in the table below. Please make a note of these details, as they will be quoted in future correspondence.

Your representor ID:	90
Your response reference:	1090
Your main issues raised:	1090.1 1090.2 1090.3 1090.4

The Council has published: copies of all responses in a document entitled "Report of Representations"; and summaries of the main issues raised (arranged according to which part of the Plan they relate) in a "Statement of Previous Consultation". You can view how your responses have been summarised by the Council in this document.

### **Submission and Examination**

Knowsley Council submitted the Local Plan Core Strategy along with supporting documents to the Secretary of State for Communities and Local Government on 19 July 2013. We now expect that an independent Planning Inspector will undertake an Examination in Public of the Plan. This will consider the soundness and legal compliance of the Plan taking account of comments made at the publication stage in 2012. This will include public hearings, which are expected to take place in November 2013.

### **Availability of documents**

Enclosed with this letter is a notice which informs you of where you may view the documents which have been submitted. Additional materials will be made available as the Examination process proceeds over the coming months. Under the relevant planning legislation, no new comments can be made on the Core Strategy at this stage although people who commented in 2012 may be invited to participate in and give evidence to the hearings.

### **Programme Officer**

The Council has appointed an independent Programme Officer to work with the appointed Planning Inspector to undertake the Examination in Public. From this point onwards, the Programme Officer will be responsible for all correspondence regarding the Examination and all queries relating to this should be directed through him. The Programme Officer contact details are:

#### **Paul Morris,**

Programme Officer (Knowsley Local Plan Core Strategy Examination)

Municipal Buildings,

Archway Road,

Huyton,

Merseyside,

L36 9YU

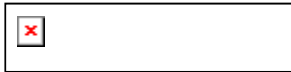
Telephone: 0151 443 3077

Email: [programmeofficer@knowsley.gov.uk](mailto:programmeofficer@knowsley.gov.uk)

The Programme Officer will contact you regarding arrangements for the hearing sessions in the coming weeks. We would be pleased if you would notify the Programme Officer if your contact details (whether email address and/or postal address) are subject to change, or if you would prefer to be contacted in a different manner.

We trust that the above information is useful. If you have any queries about the forthcoming examination in public, please contact the Programme Officer (as above). If you have any more general enquiries about the Local Plan please contact the team on 0151 443 2326.

Yours Sincerely,



Jonathan Clarke,  
Policy Manager – Places



**KNOWSLEY METROPOLITAN BOROUGH COUNCIL**

**KNOWSLEY LOCAL PLAN: CORE STRATEGY**

**TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS  
2012**

**REGULATION 22 - STATEMENT OF DOCUMENT AVAILABILITY**



On 19 July 2013, Knowsley Council submitted the **Knowsley Local Plan: Core Strategy** to the Secretary of State for Communities and Local Government. The Core Strategy is accompanied by: sustainability appraisal reports; a Statement of Previous Consultation; copies of previous representations made on the Plan under Regulation 20; and other relevant supporting documents.

The Plan and other submission documents can be viewed on the Council's website at <http://www.knowsley.gov.uk/localplan> and between 9.00am and 5.00 pm (excluding weekends and bank holidays) at:

- Halewood One Stop Shop, the Halewood Centre, Roseheath Drive, Halewood, Knowsley, L26 9UH
- Huyton One Stop Shop, Archway Road, Huyton, Knowsley, L36 9YU
- Kirkby One Stop Shop, Cherryfield Drive, Knowsley, L32 1TX
- Prescott One Stop Shop, Prescott Shopping Centre, Aspinall Street, Prescott, Knowsley, L34 5GA

You may also view the documents at Huyton, Halewood, Kirkby, Page Moss, Prescot, Whiston and Stockbridge Village libraries (the location and opening hours for which vary as shown on the website at: [www.knowsley.gov.uk/residents/libraries](http://www.knowsley.gov.uk/residents/libraries) ). All documents can be provided in alternative formats and languages on request to Knowsley Council on 0151 443 4031.

It is now expected that the Secretary of State will appoint a Planning Inspector to conduct an Examination in Public into the Plan. For further information on the Examination process, contact the Programme Officer, Paul Morris as follows:

Telephone: 0151 443 3077

Email: [programmeofficer@knowsley.gov.uk](mailto:programmeofficer@knowsley.gov.uk)

Address: Programme Officer, Knowsley Local Plan Core Strategy Examination, Municipal Buildings, Archway Road, Huyton, Merseyside, L36 9YU

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-----Original Message-----END

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# Knowsley Local Plan: Core Strategy

## Proposed Submission Document - Consultation

### Representations Form

This form must be returned to Knowsley MBC by **12 noon on Friday 21 December 2012**. Details of how you can return this form are available overleaf.

Please note you are also able to submit representations online via the Council's consultation portal at: <http://consult.knowsley.gov.uk>.

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**PLEASE CONSULT THE GUIDANCE NOTE AT THE END OF THIS DOCUMENT BEFORE FILLING IN THE REPRESENTATIONS FORM AND FILL IN THE FORM AS INSTRUCTED.**

The form has two parts:

**PART A** - Personal Details

**PART B** - Your representation(s). Please complete a separate sheet for every representation you wish to make.

#### PART A

	1. Personal Details*	2. Agents Details*
Title	Mr	Mr
Name	Robin Buckley	Peter Hamilton
Job Title (if appropriate)	Senior Planning Manager	Partner
Organisation (if appropriate)	Redrow Homes Ltd	Cass Associates
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		E-mail

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*



**PART B – Please use duplicates of Part B, as necessary.**

Name and/or Organisation:

**3. To which part of the Core Strategy does this representation relate?**

Paragraph No.  Policy No.

**4. Do you consider that the Core Strategy is...**

	Yes	No
a) Legally Compliant? (see guidance note 2.1)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Sound? (see guidance note 2.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*If you have selected No to Question 4b, please continue to Question 5. In all other circumstances, please go to Question 6.*

**5. If you consider the Core Strategy is unsound, state whether this is because it is not:**

- a) Positively prepared
- b) Justified
- c) Effective
- d) Consistent with national policy

**6. Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible, ensuring it is clear which test in Question 5 you are referring to. If you wish to **support** the legal compliance or soundness of the Core Strategy, please use this box to set out your comments.**

Redrow Homes Ltd support the aim of rebalancing the housing stock by providing a wide choice of new market housing as referenced in Policy CS1 2(a). However, we do not consider this can be achieved within the constraints placed by Policy CS1 1(a) and (e) and therefore consider the Core Strategy to be unsound. The focus of development within the existing urban areas will not provide the delivery of the widest choice of new market housing including larger executive and family housing. Many of the opportunities within the existing urban areas are low market areas and regeneration areas where such housing has not historically been delivered. It is highly unlikely that this housing will be brought forward in the future within these areas. The majority of the opportunities for executive and larger family housing will be delivered in the sustainable urban extensions.

The Council is relying on a number of former school sites and small infill sites for its housing land supply within the 0-5 year period. The majority of the sites identified within Appendix 2 of the SHLAA as contributing to 0-5 year period, although Council owned, are located in poor market areas and neighbored by large areas of existing social and low cost housing. As the Economic Viability Assessment has not yet been undertaken there must be significant concern over the delivery of housing on these sites within the first five year period. Furthermore, it is highly questionable whether these sites will provide the opportunities to deliver the transformation in the existing housing stock within the borough and bring forward executive and larger family housing that is identified as being needed to assist this change.

The SHLAA is, as it stands, not a credible evidence base to support the proposition that there is a deliverable 5 year supply of housing land to meet requirements (plus 20% in the case of Knowsley for persistent under delivery). There are a number of significant problems with the SHLAA which are identified below:



- The SHLAA has not been produced through a collaborative approach by the Council as promoted in the DCLG Practice Guidance (2007). This advises that Councils should set up a Stakeholder Panel with house builders and others which have detailed knowledge of the local housing market and the constraints/opportunities around delivering development within the Borough. This would ensure a joined up and robust approach to the identification, availability, suitability and achievability of housing sites. Collaborative working has been adopted by neighbouring LPAs, including St Helens, Halton, Warrington and the Central Lancashire authorities. However Knowsley Council have chosen to simply consult key stakeholders after the SHLAA has been produced. Consequently, the SHLAA methodology and assessment of sites is flawed and there are significant concerns over the deliverable housing supply in the Borough, particularly within the first five years.
- There are significant issues around the delivery of executive and large family housing (4+ bedroom dwellings) within the first five year period. The majority of the sites identified within this period have little or no potential for delivering this type of housing. This is primarily due to their location within low cost and social housing areas and/or that they are too small. Many of the latter sites are also located in similar areas. There is significant doubt that the transformation of the existing housing stock, with a wider choice of market housing, can be delivered within the first five years without the introduction of more appropriate sites in the Borough.
- There are significant concerns over the delivery of the first five year housing supply. The SHLAA has applied a blanket risk factor of 20% discount on all sites within the supply. However, we consider this is too simplistic. The SHLAA should assess each site and provide a realistic potential for delivery within the 0-5 year period. This exercise may discount sites altogether from the 0-5 year supply or reduce the yield within this period. It is noted that the Economic Viability Appraisal has yet to be carried out. As such there must be doubts over the Council's ability to meet the requirements for housing development within the first five year period.
- The SHLAA states that the Council has identified sufficient land and housing to meet requirements for the first five year period. Even with the 20% increase to account for persistent under delivery (paragraph 47 NPPF) the Council's SHLAA states that there is adequate supply. As indicated above there are significant issues around delivery of these sites. However, there are also serious concerns over the Council's assessment of requirement. The Council is adopting the RSS figure of 450dpa as its requirement over the plan period. The Council acknowledges within Table 3.16 of the Annual Monitoring Report and in paragraphs 7.11-7.18 of the SHLAA that it has persistently under delivered against the RSS figure since 2003 (the base date for the RSS). If this under provision is taken into account the annualised requirement is 609 dwellings from 2011-2021 (table 3.16 AMR). The historical under provision should be accounted for within the new housing provision (see representation on Policy CS3). If the historical underprovision is included within the new housing target provision target there is an undersupply in housing supply even before the issues above are considered.

We therefore consider that the Core Strategy is unsound. It has not been positively prepared as the spatial strategy does not meet the objectively assessed development needs of the Borough. Furthermore, it is not justified as it is not founded on a robust and credible evidence base. The reasons above outline the problems with the SHLAA as a credible evidence base.

Additionally, we do not consider it is consistent with the NPPF. In particular it does not comply with the core planning principle that planning should proactively drive and support economic development to deliver the homes, business, infrastructure and thriving local places that the country needs (paragraph 17). Although the Core Strategy has identified the needs of housing development it has not responded to meeting those needs or the wider opportunities for growth. Furthermore, it does not comply with paragraph 47 in that the identified housing supply, particularly within the first five years, does not provide a realistic prospect of achieving the housing supply and ensuring a choice and competition in the market for land.

**7. Please set out what **change(s)** you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified at Question 5 above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Redrow Homes Ltd consider the following changes should be made in order to make Policy CS1 sound. (Words in italics are changes to the existing text)

#### **Knowsley's Spatial Development**

1. The Spatial Development of Knowsley to 2008 *and beyond* will be achieved by:

a. A focus on *delivering* development within existing urban areas *and through a review of Green Belt boundaries to meet identified need and ensure sustainable growth.*

b. *Within the existing urban areas, development will be focused within areas in need of regeneration and areas that are easily accessible to them.*



- c. A review of the Green Belt boundaries will ensure the delivery of housing and employment development throughout the plan period whilst maintaining the openness of remaining Green Belt boundaries.
- d. As (b) of CS1
- e. As (c) of CS1
- f. As (d) of CS1

**Knowsley Spatial Development Priorities**

- 2. Priorities for the development of Knowsley to 2008 *and beyond* will be to:
  - a. Rebalance the housing stock by providing a wide choice of new market sector, *including executive and family housing*, and affordable housing with supportive services and facilities appropriate to need;
  - b-f. As existing.

**Principal Regeneration Areas**

- 3. As Existing

**Supporting text paragraphs 5.4-5.9**

As a consequence of the above proposed changes to Policy CS1 the following issues will need to be addressed within the supporting text.

Despite the rebalancing of housing stock being a key 'spatial development' priority there is no mention of this issue within the supporting text. We would recommend this being included.

Para 5.6. Amend final sentence 'One particular issue which several of the districts in the City Region have had to consider in their Local Plans is to need to review Green Belt boundaries (which were first set in Merseyside in 1983) to *ensure the delivery of development to meet identified needs and ensure sustainable growth*. Further details on this issue are set out in Policy CS5 'Green Belt'.

**Please Note** – your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at Proposed Submission stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a change to the Core Strategy, do you consider it necessary to participate at the public hearing part of the examination? (see guidance note 1.2)

a) No, I do not want to participate at the public hearing

b) Yes, I wish to participate at the public hearing

9. If you wish to participate at the public hearings, please outline why you consider this to be necessary.

Redrow Homes Ltd consider that there are significant and fundamental issues concerning elements of the evidence base and the spatial development strategy that require debate and discussion at the public hearing.

**Please note** - if you confirm that you would like to appear at the hearings, this confirmation will be used for programming purposes. The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the public hearing part of the examination.

Signature:



Date 17/12/2012.



# Knowsley Local Plan: Core Strategy

## Proposed Submission Document - Consultation



Knowsley Council

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Job Title (if appropriate)	Senior Planning Manager	Partner
Organisation (if appropriate)	Redrow Homes Ltd	Cass Associates
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		E-mail

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**PART B – Please use duplicates of Part B, as necessary.**

Name and/or Organisation:

**3. To which part of the Core Strategy does this representation relate?**

Paragraph No.

Policy No.

**4. Do you consider that the Core Strategy is...**

	Yes	No
a) Legally Compliant? (see guidance note 2.1)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Sound? (see guidance note 2.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If you have selected No to Question 4b, please continue to Question 5. In all other circumstances, please go to Question 6.

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Policy CS1 includes rebalancing the housing stock and housing provision as a key spatial development priority. However, it is noted that there is no development principle relating to or that includes a reference to housing within Policy CS2. Considering how important an issue this is within the Core Strategy we consider the Plan to be unsound without housing as a development principle or referred to within a development principle.

We consider that the Core Strategy is unsound. It is not positively prepared as that without reference to housing as a spatial development priority it is not consistent with achieving sustainable development. It is not justified in that the policy, without reference to housing, will not help ensure the achievement of social and economic objectives of sustainability.

**7. Please set out what change(s) you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified at Question 5 above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Redrow Homes Ltd would propose an amendment to Principle 1 along the following lines (new text in italics):

Principle 1: Promote sustainable economic *and social* development, tackle the causes of deprivation and narrow the gap between the richest and poorest neighbourhoods by:



a, b, c - as existing.

d. *Delivering housing growth and rebalancing the housing stock to provide an improved and wider choice of housing offer which will provide social, economic and environmental benefits, for example; increased spending power and reductions in travel to work within the Borough.*

**Please note** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at Proposed Submission stage.

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a) No, I do not want to participate at the public hearing

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*Continue on a separate sheet if necessary....*

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Date

17/12/2012

# Knowsley Local Plan: Core Strategy

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Redrow Homes Ltd has concerns around Policy CS3 in relation to the New Housing Provision figure and the density criteria.

The Council's AMR 2011 and the SHLAA (August 2012) both acknowledge that there has been an historic underprovision against the RSS figure of 450 dpa since 2003. Table 3.16 of the AMR shows that there has been a shortfall of 1,585 dwellings during the period 2003-2011. According to the SHLAA (para 7.12) the under provision against target for 2011/2012 is expected to be 309. Therefore the shortfall for the period 2003-2012 is 1,894 dwellings. This figure should be added to the figure of 8,100 dpa in section 1 of Policy CS3 which would increase the New Housing Provision to 9,994 (rounded to 10,000) for the period of 2010-2028. This would equate to an annual average of 555 dpa

The SHLAA (para 7.17) states that the Council is unlikely to be able to account for the historic underprovision and therefore exceed 450 dpa due to the current economic climate. It goes on to state that it considers that this underprovision is more likely to be accommodated for in the longer term. There are two points to consider:

1. As above the New Housing Provision figure does not account for making up the historic underprovision.
2. The Council could account for this underprovision within the early stages of the plan by bringing forward selected Green Belt sites, as part or sustainable urban extensions, in to the 0-5 year period.



The density requirement does not comply with NPPF para 47 and Government policy since 2010. Housing density should reflect local circumstances. The range of densities within table 4.2 of the SHLAA does not reflect local circumstances.

We consider Policy CS3 of the Core Strategy is not legally compliant. It does not confirm to the Regional Spatial Strategy in relation to housing provision and in particular the historic undersupply against the Borough's RSS requirement. In this regard the Core Strategy is also unsound in that it is not consistent with national and regional policy. It is also not consistent with NPPF paragraph 47 in relation to density.

It is also not positively prepared as it does not provide a realistic strategy for the supply and phasing of land for new housing development. Furthermore, it is not justified as it is not founded on a robust and credible evidence base and does not provide the most appropriate strategy for delivering housing need and growth.

**7. Please set out what **change(s)** you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified at Question 5 above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Redrow Homes Ltd recommend the following changes to Policy CS3: Housing Supply, Delivery and Distribution (changes in italics):

**New Housing Provision in Knowsley**

1. *"Provision will be made for 10,000 new dwellings equating to an annual average of 555 dpa to be delivered in Knowsley between 2010 and 2028. This accounts for historic underprovision as well as future requirements. This is a minimum net figure, accounting for conversions, changes of use to and from residential use and clearance of dwellings via demolition".*

**Distribution of New Housing**

2. As Existing

**Supply and Phasing of Land for New Housing Development**

3. *"Land for housing development will be subject to phased release to ensure at least a five year supply of deliverable sites, plus any required buffer as set by NPPF and other relevant Government Policy, is maintained at all times. This will support the efficient use of available land and the protection of urban regeneration priorities, as outlined in Policy CS1 Spatial 'Strategy for Knowsley' and Policy CS2 'Development Principles'. Green Belt land for new residential development will only be released in line with the criteria set out in Policy CS5 'Green Belt'. The supply of housing will be monitored annually and the location and phasing of development may be subject to review and change".*

**Housing Sizes, Tenures and Density**

4. *"The tenure, type, size and location of new housing delivered....." (as existing)*
5. *"Developments will need to ensure an effective and efficient use of land through an appreciation of the site's context and promoting the principles of good urban design".*

*Applications for housing development will need to demonstrate that the density of the proposal is appropriate to the area and helps to meet an identified need for housing such as executive housing and larger family housing to help rebalance the existing housing stock.*

**Please note** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at Proposed Submission stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**



8. If your representation is seeking a change to the Core Strategy, do you consider it necessary to participate at the public hearing part of the examination? (see guidance note 1.2)

- a) No, I do not want to participate at the public hearing
- b) Yes, I wish to participate at the public hearing

9. If you wish to participate at the public hearings, please outline why you consider this to be necessary.

Redrow Homes Ltd consider that there are significant and fundamental issues concerning elements of the evidence base and the spatial development strategy that require debate and discussion at the public hearing.

**Please note** - if you confirm that you would like to appear at the hearings, this confirmation will be used for programming purposes. The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the public hearing part of the examination.

Signature: 

Date 17/12/2012



# Knowsley Local Plan: Core Strategy

## Proposed Submission Document - Consultation



Knowsley Council

### Representations Form

This form must be returned to Knowsley MBC by **12 noon on Friday 21 December 2012**. Details of how you can return this form are available overleaf.

Please note you are also able to submit representations online via the Council's consultation portal at: <http://consult.knowsley.gov.uk>.

Please type or print clearly in blue or black ink, and use a separate form for each representation. If you use additional sheets, please mark them clearly with your name and organisation.

*Personal Information provided as part of a representation cannot be treated as confidential, as the Council is required to make representations available for inspection. However in compliance with the Data Protection Act the personal information you provide will only be used by the Council for the purposes of preparing the Local Plan.*





**PLEASE CONSULT THE GUIDANCE NOTE AT THE END OF THIS DOCUMENT BEFORE FILLING IN THE REPRESENTATIONS FORM AND FILL IN THE FORM AS INSTRUCTED.**

The form has two parts:

**PART A** - Personal Details

**PART B** - Your representation(s). Please complete a separate sheet for every representation you wish to make.

#### PART A

	1. Personal Details*	2. Agents Details*
Title	Mr	Mr
Name	Robin Buckley	Peter Hamilton
Job Title (if appropriate)	Senior Planning Manager	Partner
Organisation (if appropriate)	Redrow Homes Ltd	Cass Associates
Postal Address		
Postcode		
Telephone Number		
Email Address		
Preferred Method of Contact		E-mail

*\*if an agent is appointed, please complete only the Title, Name and Organisation boxes in the middle column, but complete all details of the agent in the right hand column.*



**PART B – Please use duplicates of Part B, as necessary.**

Name and/or Organisation:

**3. To which part of the Core Strategy does this representation relate?**

Paragraph No.  Policy No.

**4. Do you consider that the Core Strategy is...**

	Yes	No
a) Legally Compliant? (see guidance note 2.1)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Sound? (see guidance note 2.2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

*If you have selected No to Question 4b, please continue to Question 5. In all other circumstances, please go to Question 6.*

**5. If you consider the Core Strategy is unsound, state whether this is because it is not:**

- a) Positively prepared
- b) Justified
- c) Effective
- d) Consistent with national policy

**6. Please give details of why you consider the Core Strategy is not legally compliant or is unsound. Please be as precise as possible, ensuring it is clear which test in Question 5 you are referring to. If you wish to support the legal compliance or soundness of the Core Strategy, please use this box to set out your comments.**

Redrow Homes Ltd support the identification of the 'land bounded by A58, Prescott (housing)' at paragraph 5.50 as a 'reserved' location in that it is considered a sustainable urban extension and suitable for release from the Green Belt. The site is available, suitable and achievable for housing development and there are no know constraints to its delivery.

As stated in our representations to Polices CS1, CS2 and CS3 we consider that the Core Strategy is unsound and it cannot deliver on the required housing provision and bring about the transformational change in housing stock that is identified as being required.

The priority for the Core Strategy should be to enable sustainable development and growth to meet the immediate and longer term needs of the Borough. It has been argued in our other representations that this will not happen under the current spatial development strategy in that the urban area will not be able to deliver the required growth. As such there will be a requirement for selected urban extensions within the Green Belt to come forward earlier in the plan period. We believe that the Policy CS5 should be amended to reflect this.

We believe that the Core Strategy is unsound. It has not been positively prepared as the spatial development strategy does not meet the objectively assessed development needs of the Borough. Furthermore, it is not justified as it is not formed on a robust and credible evidence base. Additionally, we do not consider it is consistent with the NPPF. In particular, it does not comply with the core planning principle that planning should proactively drive and support economic development to deliver the homes, business, infrastructure and thriving local places that the country needs (paragraph 17). Although the Core Strategy has identified the needs for housing development it has not responded to meeting those needs or the wider opportunities for growth.



Furthermore, it does not comply with paragraph 47 of the NPPF in that the identified housing supply, particularly within the first five years, does not provide a realistic prospect of achieving the housing supply and ensuring a choice and competition in the market for land.

7. Please set out what **change(s)** you consider necessary to make the Core Strategy legally compliant or sound, having regard to the test you have identified at Question 5 above where this relates to soundness. You will need to say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Redrow Homes Ltd consider the proposed changes to Policy CS5: Green Belts should be made (changes in italics)

**New Development in the Green Belt**

1. As existing  
*Review of Green Belt Boundaries to Meet Development Needs*
2. The broad locations (identified as 'reserve' and 'safeguarded' locations in paragraphs 5.50 and 5.51) will be removed from the Green Belt to *ensure the delivery of housing and employment development over the plan period.*
3. Within the 'reserve' locations development may take place in the period to 2028 but only in accordance with the following phased approach:
  - a. Replace previous (a) with: *In the case of locations proposed for housing, permission will only be granted when it is necessary to maintain the required 'deliverable' supply of housing sites in accordance with Policy CS1 'Spatial Strategy for Knowsley' and Policy CS3 'Housing Supply, Delivery and Distribution'.*
  - b. As existing (d) of CS5
  - c. As existing (b) of CS5. The policy should include the tests to show how this is to be demonstrated.

**Please note** - your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at Proposed Submission stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

8. If your representation is seeking a change to the Core Strategy, do you consider it necessary to participate at the public hearing part of the examination? (see guidance note 1.2)

a) No, I do not want to participate at the public hearing

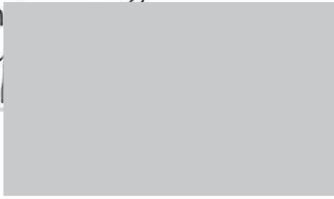
b) Yes, I wish to participate at the public hearing

9. If you wish to participate at the public hearings, please outline why you consider this to be necessary.

Redrow Homes Ltd consider that there are significant and fundamental issues concerning elements of the evidence base and the spatial development strategy that require debate and discussion at the public hearing.

**Please note** - if you confirm that you would like to appear at the hearings, this confirmation will be used for programming purposes. The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the public hearing part of the examination

Signature:



Date

7/12/2012

**Subject:** FW: Knowsley Local Plan Core Strategy

**From:** Graham Trehwella  
**Sent:** 15 October 2013 17:35  
**To:** Morris, Paul  
**Subject:** Knowsley Local Plan Core Strategy

REFERENCE EML-OUT/1078/115  
For the attention of Morris, Paul

**KNOWSLEY LOCAL PLAN : CORE STRATEGY EXAMINATION**

**MATTER 5 : GREEN BELT**

**REPRESENTOR NO : 106/127**

Dear Mr Morris

This message is to confirm that United Utilities wishes to withdraw its objections / representations to the Local Plan as far as they relate to Alternative Site D at Lydiate Lane. It has identified a likely future need to invest in the waste water treatment works (adjacent to the subject land). As a consequence, it is considered most appropriate to retain the land in the ownership of United Utilities which falls to the south and west of the wastewater treatment works.

Our representations to the Submission Local Plan in relation to this site were made jointly with the contiguous land owner (Weston House). The withdrawal of the objections / representations by United Utilities does not affect the arguments put forward by Peter Brett Associates on behalf of this land owner.

For the avoidance of doubt, United Utilities will continue to promote its case in relation to the other Green Belt sites at Carr Lane (KGBS10) and at Axis Business Park (Alternative Site B).

Best regards,

**Graham Trehwella**  
Partner



<http://www.cassassociates.co.uk>

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**Subject:** FW: Knowsley Local Plan Core Strategy

**From:** Graham Trehwella  
**Sent:** 17 October 2013 12:10  
**To:** Morris, Paul  
**Subject:** Knowsley Local Plan Core Strategy

REFERENCE EML-OUT/1078/122  
For the attention of Morris, Paul

Dear Mr Morris

Please find attached a plan which shows the land interests of United Utilities around the Woolton WwTW.

Best regards,

Graham Trehwella  
Partner




<http://www.cassassociates.co.uk>

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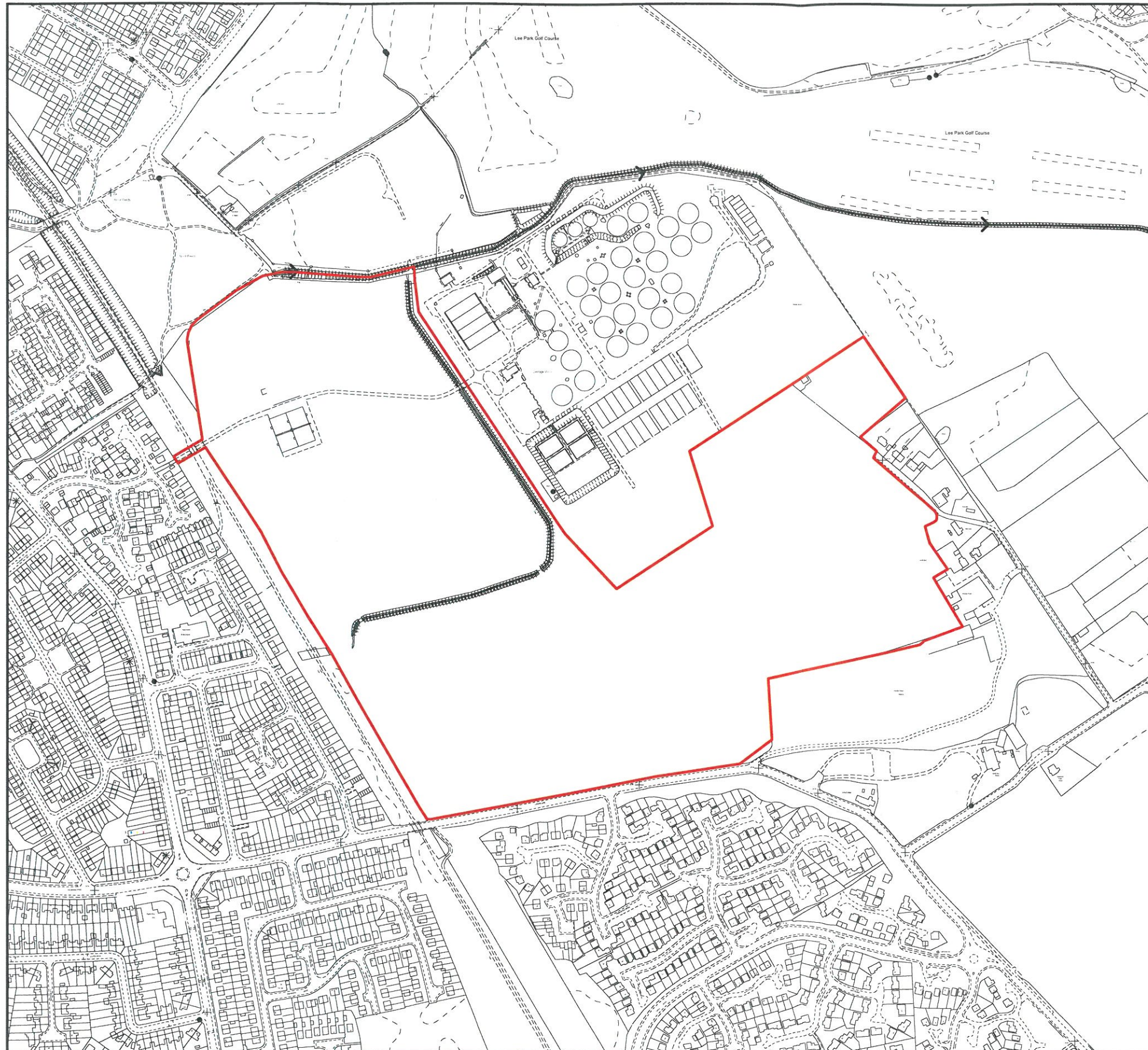
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# WOOLTON WASTEWATER TREATMENT WORKS



NGR: SJ 437 870

Scale: 1:5,000



Location Plan

Scale 1:50,000

## Legend

● - Location of Property

□ - Site Boundaries  
Approximately 30 ha / 73 acres

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