



Knowsley Council

Knowsley Local Plan: Core Strategy

Duty to Cooperate Statement - Addendum

June 2014

Duty to Cooperate Statement – Addendum (June 2014)

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1. Introduction

1.1 The **Knowsley Local Plan: Core Strategy** (referred to in this document as the “**Core Strategy**”) is one of three “development plan documents” being prepared by Knowsley Council to form the Knowsley Local Plan, the others being:

- A future Local Plan: Site Allocations and Development Policies document; and
- The Merseyside and Halton Joint Waste Local Plan.

1.2 The Localism Act (2011) introduced a duty for the Council to “co-operate” with other local planning authorities and prescribed public bodies when preparing development plan documents. The National Planning Policy Framework¹ (NPPF) provides advice on how the duty should be implemented.

1.3 This Statement sets out how Knowsley Council has satisfied the “duty to co-operate” in the most recent stages of preparing the Core Strategy, focussed on the preparation of a schedule of proposed modifications to the Core Strategy submission version.

1.4 This document acts as an addendum to the Duty to Cooperate Statement which was submitted to the Secretary of State with the Core Strategy in July 2013². This main document contains a range of background information on the duty, the bodies to which the duty applies, and sets out how Knowsley Council has cooperated with these bodies on the preparation of the Core Strategy up to submission of the Plan.

1.5 The main Duty to Cooperate Statement was made available in draft during late 2012, and comments were invited from Duty to Cooperate bodies. A number of these bodies, including all neighbouring planning authorities, responding to this confirming their agreement with the content of the Statement, including the outcomes of the cooperation on the key strategic matters outlined. These responses are set out in Appendix 2 to the main Statement.

2. Progress since submission

2.1 As noted, the Core Strategy was submitted to the Secretary of State in July 2013. Following this, an Inspector was appointed to undertake an Examination in Public into the legal compliance and soundness of the Plan. As part of this process, a series of Examination hearings were held in November 2013. At these sessions, the compliance of the plan preparation process with the duty to cooperate was discussed, and the Inspector indicated his initial view that the plan preparation process demonstrated compliance with the duty up to that point.

¹ The National Planning Policy Framework (CLG, 2012)

² Knowsley Local Plan Core Strategy: Duty to Cooperate Statement (Knowsley MBC, 2013) (Examination Library Reference: SD14)

2.2 Following these hearing sessions, the Inspector issued his Interim Findings in early 2014, which set out a range of areas within the Plan which he invited the Council to consider modifying, in order that the Plan could be found to be sound. Accounting for these findings, the Council has prepared a Schedule of Proposed Modifications³ to the Core Strategy, which proposes changes to the Plan across several key areas, including:

- Bringing forward nine areas which were previously identified as "reserve" locations for future release from the Green Belt as site allocations (known as "Sustainable Urban Extensions") for employment, residential or mixed use development;
- Identifying a boundary for the location previously identified as "safeguarded land" for release for residential development post-2028;
- Supplying new policies to guide the development of the Sustainable Urban Extensions;
- Reducing the employment land target (from 2010 to 2028) from 183.5ha to ca 164ha;
- Introduction of a variable affordable housing target, of 25% within Sustainable Urban Extensions, but reduced to 10% within existing urban areas;
- Introduction of a hierarchy of categories of developer contributions which would inform negotiations where a developer cannot afford to fund all the developer contributions to different forms of infrastructure;
- Removal of references to the Merseytram project;
- Changes to the Policies Map to reflect the proposed allocation of the Sustainable Urban Extension; and
- Other more minor changes,

Further information about the proposed modifications is available in the aforementioned schedule and the range of supporting documents the Council has produced to support the modifications.

3. Impacts of the Proposed Modifications

3.1 The impacts of the proposed modifications on each of the strategic matters identified in the Duty to Cooperate Statement have been considered in turn. Appendix A of this addendum report sets out the findings of this consideration. This highlights, from the Council's perspective, the areas for which it is anticipated that the modifications may impact on the interests of the Duty to Cooperate bodies, as indicated by the matters they responded through cooperation on earlier stages of Plan preparation.

4. Cooperation since Submission

4.1 On 15 May 2014, the Council notified the relevant bodies of its broad intentions with respect to the proposed modifications to the Core Strategy.

³ Knowsley Local Plan Core Strategy: Schedule of Proposed Modifications to the Submission Document (Knowsley MBC, 2014) (Examination Library Reference: CS08)

This involved the sending of a letter (see Appendix B) to each of the bodies prescribed in the main Duty to Cooperate Statement, as set out below:

- Halton Borough Council (as planning and highway authority)
- Liverpool City Council (as planning and highway authority)
- St Helens Council (as planning and highway authority)
- Sefton Council (as planning and highway authority)
- Cheshire West and Chester Council (as planning authority)
- Warrington Borough Council (as planning authority)
- West Lancashire Borough Council (as planning authority)
- Wirral Council (as planning authority)
- Lancashire County Council (as county planning and transport authority)
- The Environment Agency
- English Heritage
- Natural England
- Civil Aviation Authority
- Homes and Communities Agency
- *NHS Knowsley (as the Primary Care Trust)**
- Office of Rail Regulation
- Merseytravel (as integrated transport authority)
- Marine Management Organisation
- Liverpool City Region Local Enterprise Partnership
- Liverpool City Region Local Nature Partnership
- *Knowsley Clinical Commissioning Group***

*Since the original list was set, the functions of the Primary Care Trust which related to public health have been transferred from NHS Knowsley to Knowsley Council. Officers involved with this function of the Council have been involved in the preparation of the modifications, and hence are not included as a separate body.

**The Knowsley Clinical Commissioning Group (CCG) has been added to the list because they are now a body to whom the duty to cooperate applies as a result of subsequent revisions to the Town and Country Planning (Local Planning)(England) Regulations 2012.

- 4.2 In addition to the bodies set out above, the Council also included the Countryside Council for Wales / Natural Resources Wales, who although not a prescribed body, were included in correspondence due to their importance in the context of separate legislation relating to the Habitats Regulations Assessment.
- 4.3 The letter of 15 May 2014 (Appendix B) sets out an update with respect to the progress of the Examination of the Core Strategy, including the Inspector's Interim Findings. The letter also outlined the issues which the Council considered necessary to address through the modifications process, including selected of the matters highlighted in Appendix A, which were considered to be of particular interest to the Duty to Cooperate bodies. Finally, the letter set out the next steps associated with progressing the Plan preparation process,

explaining that bodies would retain the opportunity to formally comment on the modifications during a consultation period to follow in summer 2014.

- 4.4 The Council received only one response to its letter of 15 May 2014, which came from English Heritage and confirmed that they had no comments to make.

5. Next Steps

- 5.1 In the spirit of ongoing cooperation with respect to the preparation of the Core Strategy, it is the Council's intention to continue to involve the prescribed Duty to Cooperate bodies, and other interested parties, in the subsequent stages of Plan preparation. At the current time, this is expected to include:

- Notification of re-convened Examination hearings (for those who submitted representations at the Proposed Submission stage in late 2012);
- Notification of the period of consultation relating to the proposed modifications to the Plan (expected in summer 2014);
- Publication of a range of supporting documents for the modifications process, including a Sustainability Appraisal and Habitats Regulation Assessment; and
- Cooperation in the preparation of subsequent Local Plan documents, including the Local Plan: Site Allocations and Development Policies or reviews of these.

Appendix A: Impacts of the Proposed Modifications on the Strategic Matters identified in the Duty to Cooperate Statement

Strategic Matter	Summary of Relevant Proposed Modifications	Impacts of the Proposed Modifications on the Strategic Matter
1. The level of housing growth in Knowsley relative to neighbouring areas	<ul style="list-style-type: none"> No modifications proposed in this area. 	<ul style="list-style-type: none"> The level of housing growth sought in Knowsley between 2010 and 2028 has not been amended through the proposed modifications, therefore there is not considered to be any impact on the interests of the Duty to Cooperate bodies.
2. The mix of housing types and levels of affordable housing provision to be planned for in Knowsley relative to neighbouring areas	<ul style="list-style-type: none"> Alters the approach to affordable housing policy by lowering the target for contributions from market housing developments (of 15 dwellings or more) in urban areas from 25% to 10%. Adds additional flexibility to the policy around the tenure of affordable housing to be delivered through market housing schemes. Introduces a broad hierarchy for developer contributions to be sought when economic viability is proven to be challenging. Affordable housing contributions are considered to be in the “negotiable” category, below essential requirements and identified localised priorities. 	<ul style="list-style-type: none"> It is not expected that the proposed modifications will bring a change to the consensus from Duty to Cooperate partners that the Council’s approach to affordable housing delivery is appropriate. The proposed modifications would result in a lower target of affordable housing provision being sought from sites within the urban area. However, this lower target more accurately reflects the available economic viability evidence, which makes it a more realistic target, and one which may have been sought on a site-by-site basis in any case. Therefore, it may not significantly affect the affordable housing delivered from this source within Knowsley. Providing additional flexibility around the tenure of affordable housing to be delivered, which provides further clarification to the approach rather than a fundamental change. The clarification provided regarding the prioritisation of developer contributions is aimed at providing additional clarity for the negotiation process where development viability is challenging. This is not expected to impact on the interests of the Duty to Cooperate bodies with respect to affordable housing provision.
3. The level of gypsy and traveller accommodation in Knowsley relative to	<ul style="list-style-type: none"> Adds additional confirmation of the Council’s intention to comply with national policy with respect to accommodation for gypsy and 	<ul style="list-style-type: none"> The modification seeks to clarify the Council’s position regarding it’s intention in a subsequent Local Plan document to identify a target for pitch provision, and to allocate any site(s) that are required to meet this level of provision. This is

Strategic Matter	Summary of Relevant Proposed Modifications	Impacts of the Proposed Modifications on the Strategic Matter
neighbouring areas	travellers.	not expected to impact on the interests of the Duty to Cooperate bodies, as the Council has been working jointing with neighbouring authorities on evidence which will inform the position in all relevant Local Plans.
4. The amount of land needed for employment in Knowsley relative to neighbouring areas	<ul style="list-style-type: none"> • Lowers employment land target from 183.5ha to c.164ha. This modification seeks to reflect the Inspector’s view regarding the level of need for employment land in Knowsley, and is justified with reference to updated monitoring information. • Allocates “Sustainable Urban Extensions” for employment uses, to accommodate the qualitative deficit in the urban employment land supply for business park and logistics uses. 	<ul style="list-style-type: none"> • The original needs assessment for employment land in Knowsley was based on the Joint Employment Land and Premises Study, however the target was revised down from the recommendations in this study. The modifications propose a further marginal reduction in the plan period employment land target, and it is not anticipated that this will impact on the interests of Duty to Cooperate bodies. • The delivery of the revised target for employment land continues the approach of Knowsley meeting its own needs, and not requiring any assistance from neighbouring authorities in this matter. In addition, this continues the approach of not making any provision to meet the needs of neighbouring authorities. This reflects the findings of the Liverpool City Region Housing and Economic Development Evidence Base Overview Study and is a continuation of the previous approach for which there was support from the Duty to Cooperate bodies. • The modifications also do not affect the requirement for the overall quantum of Green Belt land to be released to meet employment land needs within the Plan period. However, they do reflect the Inspector’s findings relating to a shortage of employment sites to accommodate business parks and logistics uses, reflected in the modifications to allocate Sustainable Urban Extensions for these uses, in order that the short term land supply can be expanded (see matters 5 and 6).

Strategic Matter	Summary of Relevant Proposed Modifications	Impacts of the Proposed Modifications on the Strategic Matter
<p>5. The approach to reviewing Green Belt boundaries in Knowsley to meet development needs</p>	<ul style="list-style-type: none"> • Allocates 9 “Sustainable Urban Extensions”, making these available for development sooner than the previous “reserved broad locations”, removes related phasing mechanism • Allocates one further location as “Safeguarded Land” for development after 2028 	<ul style="list-style-type: none"> • The proposed modifications respond to the findings of the Inspector concerning the quantity of land available for residential development and the types of locations available for employment development in early part of the plan period. The overall quantum of land proposed for release from the Green Belt is not proposed to be changed. The impact of the modifications is that locations currently within the Green Belt will technically be allocated and available for development <u>sooner</u> than anticipated within the submitted Plan. However, it should be noted that the lead-in time for development of some of the larger locations means that the timing of development is not expected to alter significantly. Duty to Cooperate bodies may need to consider this issue in the light of concerns previously raised regarding the impact of Green Belt release in Knowsley on sub-regional regeneration priorities.
<p>6. Any cross boundary impacts arising from specific broad locations proposed for Green Belt release</p>	<ul style="list-style-type: none"> • Allocates 9 “Sustainable Urban Extensions”, making these available for development sooner than the previous “reserved broad locations”, removes related phasing mechanism • Allocates one further location as “Safeguarded Land” for development after 2028 • Introduces a range of policies to guide development within Sustainable Urban Extensions, including provisions for masterplanning of larger locations. 	<ul style="list-style-type: none"> • The locations of the sites proposed for allocation as Sustainable Urban Extensions are the same as the “broad locations” previously identified to be reserved for later release, drawing on the evidence base available at the submission of the Plan. This means that the modifications affect only the <u>timing</u> of development coming forward within these locations. Duty to Cooperate bodies may need to consider this issue in the light the impacts this could have on their priorities. • The modifications also provide more detailed policy guidance for the development of the Sustainable Urban Extensions, with specific policies being provided for the largest three of these locations, whose development will be subject to the preparation of agreed masterplans. This means that the

Strategic Matter	Summary of Relevant Proposed Modifications	Impacts of the Proposed Modifications on the Strategic Matter
		<p>cross-boundary impacts associated with the proposed modifications can be minimised, although the Duty to Cooperate partners may also consider it appropriate to review this.</p>
<p>6. The strategic role of Knowsley’s town centres (Huyton, Kirkby and Prescot) relative to centres in neighbouring districts</p>	<ul style="list-style-type: none"> Alters the approach to town centre expansion in Kirkby, should the extant planning permission for expansion and regeneration of the centre not be implemented. 	<ul style="list-style-type: none"> The modifications set out that the Council will not automatically designate the area south of the existing town centre as an expansion area (in accordance with the extant permission) – rather that the option for expansion would be considered if necessary to create sufficient capacity for retail-led regeneration. The quantum of retail development attributable to Kirkby town centre remains as per the submitted Plan. This was not a significant matter raised through the Duty to Cooperate process and therefore is not considered to present a risk of a significant change in position for Duty to Cooperate bodies.
<p>8. The impacts of the Core Strategy on transport infrastructure in the Liverpool City Region</p>	<ul style="list-style-type: none"> Removes references to Merseytram scheme Allocates 9 “Sustainable Urban Extensions”, making these available for development sooner than the previous “reserved broad locations”, removes related phasing mechanism Introduces a range of policies to guide development within Sustainable Urban Extensions, including provisions for masterplanning of larger locations. Introduces a broad hierarchy for developer contributions to be 	<ul style="list-style-type: none"> The modifications proposed the removal of references to the Merseytram scheme, which is no longer identified as a sub-regional transport infrastructure priority. The rationale for the change relates to the deliverability of the project. Given that all Duty to Cooperate bodies affected by this change should be aware of the removal of the scheme as a transport priority which affects the City Region, the proposed modification not expected to have any significant impacts. Additional modifications propose to allocate locations in the Green Belt as Sustainable Urban Extensions (see matter 5 and matter 6). This affects the timing of development coming forward in these locations, rather than the nature of development. Therefore the findings of the existing transportation evidence and modelling should remain valid. Consideration of highways and other transport infrastructure

Strategic Matter	Summary of Relevant Proposed Modifications	Impacts of the Proposed Modifications on the Strategic Matter
	<p>sought when economic viability is proven to be challenging. The priority order will be finalised depending on the development, the nature of the infrastructure sought, and identified local priorities.</p>	<p>matters is highlighted within the Sustainable Urban Extensions policies introduced through the proposed modifications.</p> <ul style="list-style-type: none"> The clarification provided regarding the prioritisation of developer contributions is aimed at providing additional clarity for the negotiation process where development viability is challenging. This is not expected to impact on the interests of the Duty to Cooperate bodies with respect to transport infrastructure provision.
<p>9. The impacts of the Core Strategy on other forms of infrastructure (e.g. utilities) in the Liverpool City Region</p>	<ul style="list-style-type: none"> Allocates 9 “Sustainable Urban Extensions”, making these available for development sooner than the previous “reserved broad locations”, removes related phasing mechanism Introduces a range of policies to guide development within Sustainable Urban Extensions, including provisions for masterplanning of larger locations. Introduces a broad hierarchy for developer contributions to be sought when economic viability is proven to be challenging. The priority order will be finalised depending on the development, the nature of the infrastructure sought, and identified local priorities. 	<ul style="list-style-type: none"> Additional modifications propose to allocate locations in the Green Belt as Sustainable Urban Extensions (see matter 5 and matter 6). This affects the timing of development coming forward in these locations, rather than the nature of development. The infrastructure capacity to support development in these locations (as set out in evidence base and supporting documents) should not be significantly altered by this proposed change. Consideration of infrastructure required to support development within the Sustainable Urban Extensions policies is introduced through new policies proposed to be incorporated in the Plan through the modifications process. The clarification provided regarding the prioritisation of developer contributions is aimed at providing additional clarity for the negotiation process where development viability is challenging. This is not expected to impact on the interests of the Duty to Cooperate bodies with respect to infrastructure provision.
<p>10. The potential future expansion of</p>	<ul style="list-style-type: none"> No modifications proposed in this area. 	<ul style="list-style-type: none"> The approach to the strategic infrastructure at Liverpool John Lennon Airport has not been amended through the proposed

Strategic Matter	Summary of Relevant Proposed Modifications	Impacts of the Proposed Modifications on the Strategic Matter
Liverpool John Lennon Airport		modifications, therefore there is not considered to be any impact on the interests of the Duty to Cooperate bodies.
11. The impacts of the Strategy on strategic health provision (e.g. Whiston Hospital), and community and cultural infrastructure in the City Region	<ul style="list-style-type: none"> Introduces a broad hierarchy for developer contributions to be sought when economic viability is proven to be challenging. The priority order will be finalised depending on the development, the nature of the infrastructure sought, and identified local priorities. 	<ul style="list-style-type: none"> The clarification provided regarding the prioritisation of developer contributions is aimed at providing additional clarity for the negotiation process where development viability is challenging. This is not expected to impact on the interests of the Duty to Cooperate bodies with respect to strategic health, community or cultural infrastructure provision.
12. The impact of the strategy on the low carbon infrastructure potential of the Liverpool City Region	<ul style="list-style-type: none"> Removes selected sustainable design standards, due to the need for compliance with the emerging national approach to Building Regulations. Introduces a broad hierarchy for developer contributions to be sought when economic viability is proven to be challenging. The priority order will be finalised depending on the development, the nature of the infrastructure sought, and identified local priorities. 	<ul style="list-style-type: none"> The modifications which reflect the emerging national approach of incorporating sustainable design standards into Building Regulations are not expected to impact on the interests of the Duty to Cooperate bodies, since other local authorities will be expected to adopt a similar approach in due course. The clarification provided regarding the prioritisation of developer contributions is aimed at providing additional clarity for the negotiation process where development viability is challenging. Decentralised energy is highlighted as a local priority for selected areas of the Borough, which is in accordance with evidence base prepared jointly across the City Region. This is not expected to impact on the interests of the Duty to Cooperate bodies with respect to low carbon energy infrastructure.
13. The impact of the Strategy on Green Infrastructure in the Liverpool City Region	<ul style="list-style-type: none"> Introduces additional clarity about the role of special qualities in assessing greenspaces, and the circumstances within which it would 	<ul style="list-style-type: none"> The modifications provide additional clarification about the role of greenspaces and Green Infrastructure in Knowsley, and are not expected to impact on the role and function of this infrastructure in the wider City Region. This modification

Strategic Matter	Summary of Relevant Proposed Modifications	Impacts of the Proposed Modifications on the Strategic Matter
	<p>be appropriate to designate a local greenspace.</p> <ul style="list-style-type: none"> Introduces additional clarity regarding the role of greenspaces in meeting biodiversity and ecological networks objectives and compensating/mitigating for any loss Introduces a broad hierarchy for developer contributions to be sought when economic viability is proven to be challenging. The priority order will be finalised depending on the development, the nature of the infrastructure sought, and identified local priorities (including greenspaces in identified areas of deficit). 	<p>should assist the Council in supporting joint initiatives including the Liverpool City Region Ecological Network.</p> <ul style="list-style-type: none"> The clarification provided regarding the prioritisation of developer contributions is aimed at providing additional clarity for the negotiation process where development viability is challenging. Greenspace provision is given a relative priority in areas of existing deficit. This is not expected to impact on the interests of the Duty to Cooperate bodies with respect to strategic green infrastructure or the role and function of such infrastructure across the City Region.
<p>14. The impact of the Strategy on protected natural habitats including those in neighbouring districts protected by European legislation</p>	<ul style="list-style-type: none"> Introduces additional clarity regarding the role of greenspaces in meeting biodiversity and ecological networks objectives and compensating/mitigating for any loss 	<ul style="list-style-type: none"> The modifications provide additional clarification about the role of greenspaces in meeting various objectives and ensuring that new development adequately compensates and/or mitigates for any detrimental impacts on these assets. This modification should assist the Council in supporting joint initiatives including the Liverpool City Region Ecological Network. It is therefore not anticipated that this will have a significant impact on the priorities of the Duty to Cooperate partners. <i>NB the modifications are accompanied by a Habitats Regulations Assessment which assesses the impacts of the modifications on designated European sites, which Duty to</i>

Strategic Matter	Summary of Relevant Proposed Modifications	Impacts of the Proposed Modifications on the Strategic Matter
		<i>Cooperate partners may find it helpful to review.</i>
15. The impact of the Strategy on water management issues including flooding	<ul style="list-style-type: none"> • Adds a minor clarification that the flood risk policy applies to development within or which otherwise affects a flood zone 	<ul style="list-style-type: none"> • The modification is minor in nature and provides clarification about the operation of the flood risk policy. It is not expected to impact on the interests of the Duty to Cooperate bodies.
16. The safeguarding of minerals resources	<ul style="list-style-type: none"> • Adds additional clarification about the role of Minerals Safeguarding Areas and to reflect the findings of a new study 	<ul style="list-style-type: none"> • The clarification regarding the role of Minerals Safeguarding Areas within the Plan is not expected to impact on the interests of the Duty to Cooperate bodies. Similarly, an update regarding the findings of the Local Aggregates Assessment which has been prepared jointly with other Duty to Cooperate bodies is not expected to have any significant impacts.

**Appendix B: Letter to Duty to Cooperate bodies from Knowsley Council, 15
May 2014**



Please ask for: Jonathan Clarke
Tel No: 0151 443 2299
Email: jonathan.clarke@knowsley.gov.uk

Knowsley Council

To: Local Plan contacts,
"duty to cooperate" bodies

Our Ref: Core Strategy DTC

Date: 15 May 2014

Knowsley Local Plan Core Strategy – duty to cooperate

Dear colleague,

I am writing to update you on the likely next steps in preparing the Knowsley Local Plan Core Strategy (“**the Plan**”). The Plan was submitted to the Secretary of State in July 2013, and is currently undergoing its Examination in Public. Following hearing sessions held in November 2013, the Inspector issued his [interim findings](#) in January 2014.

The Inspector’s interim findings

The Inspector’s interim findings were published on the basis of evidence submitted up to that point and do not constitute his final conclusions. They identify that, whilst the Plan is sound in key respects, there are a limited number of issues on which modifications are likely to be required. These include (amongst others):

1. A shortfall in the Council’s 5 year supply of deliverable sites for housing development up to 2018;
2. The plan period (2010-2028) employment land target of 183.5 hectares is towards the upper end of the range of likely needs and a more realistic and achievable minimum target is in the region of 160 hectares; and
3. Whilst the short term supply of employment land appears sufficient in quantitative terms, there is a short term need for land to be released for a new business park and to a lesser extent large scale distribution uses.

To address these and other aspects of the Inspector’s findings we intend to seek approval by the Council’s Cabinet for modifications to the Plan. This approval is likely to be sought on 18 June 2014, although this date has yet to be confirmed. The Inspector then intends to hold re-convened hearing sessions (currently scheduled for 22-24 July 2014) before the Council undertakes public consultation on the modifications (between August and October 2014). The Inspector could then be in a position to issue his final report on the soundness of the Plan (as modified) later in 2014.

Why are we contacting you at this stage?

We are contacting Local Plan contacts within our Duty to Co-operate partner organisations in advance of seeking approval for the modifications by the Council’s Cabinet in June 2014. This is to let you know in broad terms the likely next steps and give you the opportunity to raise any points at this stage.

The issues to be addressed in the modifications

Short term development needs

To address the Inspector's concerns about short term land supply for housing and specific employment needs (issues 1 and 3 listed above), options include converting some or all the sites identified in the Plan for future Green Belt release to site allocations with no phasing mechanism preventing their early development. These sites were identified as "reserve" locations on the key diagram and in paragraph 5.50 of the submission version of the Plan (document reference CS01 in the [examination library](#)). Their development capacities (as currently estimated) are indicated in the annex to this letter.

Other alternative locations for potential Green Belt release were considered but rejected by the Inspector. The report to Knowsley's Cabinet in June 2014 will set out the preferred approach. The effect of bringing forward all or some of the sites as allocations with no phasing restrictions would be that development could start in these before 2018 (as opposed to potentially 2020/21 as suggested in the current Plan).

Safeguarded land

A further site (at Knowsley Village) was identified as safeguarded land for post 2028 housing needs; the Inspector has not commented on this in his interim findings. We are considering identifying the site boundary at this stage as opposed to in a future Local Plan document.

Employment target

We are considering reducing the employment target (from 2010 to 2028) from 183.5ha to ca 164ha. This is just over the Inspector's estimate of need with the variation justified by latest monitoring information.

Affordable housing and developer contributions

The Inspector's interim findings invite the Council to reconsider its affordable housing target and how developer contributions are prioritised in circumstances where (as in parts of Knowsley) development viability is challenging. As part of the modifications to the Plan we are considering recommending a variable affordable housing target (potentially with a target for sites in current urban areas which is lower than the 25% subject to viability which is currently set out in the Plan). We are also considering proposing (for inclusion in policy CS27 "Planning and Paying for New Infrastructure") a hierarchy of categories of developer contributions which would inform negotiations where a developer cannot afford to fund all the developer contributions to different forms of infrastructure and/or affordable housing which may apply in specific cases.

Town centres and retail

We are considering modifying policy CS10 "Principal Regeneration Area – Kirkby town centre" in line with the Inspector's interim findings (paragraphs 15 and 16).

The schedule of modifications

We have yet to finalise the schedule of modifications to the Plan. This will contain modifications covering the strategic issues mentioned above and other mainly detailed points. The schedule will be available with the papers for Cabinet on the [Council website](#) a week before the Cabinet meeting scheduled provisionally for 18 June 2014.

Your opportunity to comment

Your organisation will be able to comment formally on the modifications during the consultation period which is scheduled to start in August 2014. If your organisation made representations at the proposed submission stage in 2012 you will also receive notification from the Programme Officer of the re-convened hearings scheduled for July 2014. In the meantime you may also wish to submit views on the issues set out above, or the other matters raised in the Inspector's interim findings. To be formally considered at this stage, any comments would need to be sent to me by 27 May 2014 so that these may be referred to in our report to Cabinet in June 2014. Any views would be received by Knowsley Council on a without prejudice basis, so that – in the spirit of ongoing co-operation – you can also respond to the formal consultation on the modifications.

If you have any queries, please do not hesitate to contact me on 0151 443 2299. We would be happy to meet with individual partners if that would be helpful.

Many thanks,

Jonathan Clarke

Jonathan Clarke

Policy Manager (Places)
Policy Impact and Intelligence
Knowsley Council

Annexes:

1. Reserve locations identified for long term Green Belt release in submission draft of Plan (2012) – estimated site capacities

ANNEX 1

"Reserve locations" identified for long term Green Belt release in submission draft of Plan (2012) – estimated site capacities

(capacities revised in 2014)

SITE	RESIDENTIAL CAPACITY (DWELLINGS)	EMPLOYMENT CAPACITY (HECTARES)
Bank Lane, Kirkby	207 ¹	-
East of Knowsley Industrial and Business Parks, Kirkby	-	7.2
Knowsley Lane, Huyton	101	17.5
Edenhurst Avenue, Huyton	86	-
Land bounded by A58, Prescot	133	-
Carr Lane, Prescot ²	74	-
South of Whiston	1503	-
Land South of M62		22.51
East of Halewood	1124	-

¹ the estimated capacity for the land at Bank Lane is drawn from planning application reference 13/00393/OUT

² In line with the Inspector's Interim Findings, the land at Carr Lane, Prescot is no longer considered to have any deliverable capacity for employment as it is likely to be developed for housing in conjunction with neighbouring land at the former Prysmian site, Prescot.

For more information log on to
www.knowsley.gov.uk/LocalPlan

You can also get this information in other formats.
Please phone Customer Services on 0151 443 4031
or email customerservices@knowsley.gov.uk



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