

**KNOWSLEY LOCAL PLAN: CORE STRATEGY****KNOWSLEY METROPOLITAN BOROUGH COUNCIL****HEARING STATEMENT 13B****2. COUNCIL'S RESPONSE TO INSPECTOR'S INTERIM FINDINGS****Employment land target**

2.9 *Is the revised minimum target for employment land in the KLPCS policy CS4 (modification M063) justified by the evidence?*

2.9.1 The Council's proposed modification M063 (CS08, pg. 18) reflects the Inspector's 'Interim Findings' document (EX26) which suggested that the employment target within the 'Local Plan: Core Strategy Submission version' (CS01) is toward the upper end of the range of probable needs. The Inspector's findings suggested a more realistic and achievable minimum target is around 160 hectares (paragraph.6, pg.2) for the Plan period. Proposed modification M063 seeks a marginally higher minimum requirement of 164 hectares for the period between 2010 and 2028. This translates to a remaining requirement of 153 hectares as at 2013, after the take up between 2010 and 2013 is deducted (see proposed modification M071, Table 5.1A, CS08, pgs. 20 - 21).

2.9.2 The Inspector's suggestion in EX26 and the publication of Planning Practice Guidance (PG01b) required the Council to revisit the original employment requirement and the associated evidence previously prepared, including the Technical Report: Planning for Employment Growth (TR02) relating to employment land forecasting. In this respect, the Council is satisfied that the justification and general conclusions relating to the suitability and preference for the long term historic trends methodology over other options remains appropriate as set out in document TR02 and supplemented by the Council's Statement 4A (CH04A). However when considering the detail of any calculation of an actual requirement in the context of Table 3.4 of TR02 (pg.28) it is evident that any preference between potential forecasting scenarios of annual average take up based upon 'All Employment Land' or the alternative 'For Employment Purposes' is a matter of judgement.

2.9.3 The preparation of the employment land target within the 'Local Plan: Core Strategy Submission version' (CS01) of 183.5 hectares was based upon application of the 'All Employment Land' forecasting scenario at an annual average of 10.2 hectares. The preference for this approach reflected the intention to incorporate a degree of uplift to the overall requirement equivalent to the extent of historic take up of employment land for other uses. The flexibility provided by this approach was acknowledged in the Council's Statement CH04A (para 4.3.4, pg. 6) together with a caveat that such a proportion of employment land loss may not be replicated to the same extent in the future. The Council's proposed modification M063 now clarifies that the

requirement is the minimum provision of land to be developed for employment use rather than a limitation. Consequently it is no longer necessary or appropriate to include an uplift to the requirement to reflect loss of supply to development of non-employment uses. This is noting the flexibility within the total employment land supply relative to discounting as set out in Table 5.1A (M071, CS08, pgs. 20 - 21) makes an allowance for potential losses to non-employment uses.

- 2.9.4 In considering the above, the Council's proposed modification M063 is based upon a calculation in accordance with the 'For Employment Purposes' historic take up forecasting method identified in Table 3.4 of TR02 (pg.28). The minimum requirement of 164 hectares for the Plan period of 2010 - 2028, is consistent with the up to date annual average take up of 9.11 hectares identified for the most recent 18 year monitoring period comprising 1995/96 - 2012/13. As explained in document TR02 (para 5.5.8, pgs. 59 - 60), this time period is preferred as it adapts to the implications and longevity of the effects of the recent recession, whilst ensuring consistency with the length of the Plan period and the most recent economic cycle. The Council accepts that there are consequential drawbacks of the three year overlap of forecasting within the Plan period and the resultant adjustments from under-delivery upon the annual average. However this influence is acceptable given the requirement is expressed as a minimum rather than a limitation and is intended to be realistic and achievable by 2028.
- 2.9.5 In the interest of clarity, it should be noted that the calculation of the minimum employment requirement in proposed modification M063 is a departure from the methodology recommended in document TR02 (para 5.5.8, pg. 60) of a ½ year take up for 2012/13 as used in CS01 to reflect the publication date of the Proposed Submission version. The Council considers that an alternative approach of including a full year's take up for 2012/13 is now important to ensure that the base date for the requirement, take up and supply within Table 5.1A (M071) is consistent. Such a methodological shift is not considered to prejudice the potential for additional growth associated to a marginally higher calculation that would be obtained by the previous method (9.26 hectare annual average x 18 years = 166.68 hectare requirement for 2010 - 2028). This is due to the employment requirement now being expressed as a minimum (as explained previously) and sufficient flexibility remaining in the total land supply to provide necessary capacity for additional growth as required.
- 2.9.6 The Council considers that the revised employment requirement as set out in proposed modification M063 is appropriately justified by evidence and is sound. This is noting that the quantitative minimum requirement at clause 2 of policy CS4, is supplemented by qualitative considerations relating to land supply at clause 4 of policy CS4 (proposed modification M066, CS08, pgs. 18 and 19) to ensure an appropriate range and choice of employment sites.