



United Utilities Water PLC  
Developer Services & Planning  
Grasmere House  
Lingley Mere Business Park  
Lingley Green Avenue  
Warrington  
WA5 3LP

Telephone : 01925 731 285  
Planning.liaison@uuplc.co.uk

**By email only: programmeofficer@knowsley.gov.uk**

Paul Morris - Programme Officer  
Knowsley Local Plan Core Strategy Examination  
Municipal Buildings  
Archway Road  
Huyton  
Merseyside L36 9YU

**Your ref:**  
**Our ref: DC-14-2636**  
**Date: 11 July 2014**

Dear Mr Morris

## **KNOWSLEY LOCAL PLAN: CORE STRATEGY SUBMISSION DOCUMENT INCORPORATING PROPOSED MODIFICATIONS**

United Utilities welcomes the opportunity to comment on the Knowsley Local Plan: Core Strategy Submission Document Incorporating Proposed Modifications.

### **Previously Developed Sites within the Green Belt**

#### **Paragraph 5.41A**

United Utilities wishes to support the addition of paragraph 5.41A which sets out an intention to identify major developed sites in the Green Belt used by utility operators. In considering the detailed guidance regarding new development within these major utility sites in the Green Belt, United Utilities wishes to emphasise that it is essential that any future policy facilitates any necessary utility development at key utility sites to ensure the flexible delivery of infrastructure which in turn enables the delivery of development to meet the needs of the wider borough.

It is also worth noting that the redevelopment of existing sites in the Green Belt can often be in isolated locations where infrastructure is limited. As such it may be necessary to co-ordinate the delivery of redevelopment with infrastructure upgrades.

#### **Policy SUE2**

United Utilities wishes to support criterion 1b) of Policy SUE 2 which emphasises that the Sustainable Urban Extensions must demonstrate a comprehensive approach to site development and infrastructure provision.

In respect of section 3) of this policy, United Utilities recommends that there is a need to ensure the Sustainable Urban Extensions are delivered in accordance with a comprehensive strategy for drainage infrastructure. United Utilities suggest the following amendment:

***3. For each of the locations referred to in policies SUE 2a) to 2c) (Knowsley Lane, Huyton; East of Halewood; and South of Whiston & Land South of M62), the Council will prepare further guidance in the form of a master plan and associated Supplementary Planning Document. Within these locations proposals for development***

***will only be approved where they are in accordance with a master plan that has been approved beforehand by the Council. All planning applications must accommodate development proportionally in accordance with the master plan meeting relevant policy and infrastructure requirements including, but not limited to, design principles, affordable housing, phasing, density, public realm and open space requirements, and other infrastructure provision, together with a comprehensive transport strategy and comprehensive drainage strategy for the whole of each SUE site.***

United Utilities notes that some of the Sustainable Urban Extensions are made up of numerous parcels of land in different ownerships. Our experience from dealing with other strategic development sites is that following allocation and adoption, applications are pursued in advance of the preparation of masterplans and independently of other landowners thus rendering an approach to development which is not comprehensive. This therefore results in the delivery of development which is not the most sustainable. Whilst acknowledging the challenges of the need to deliver development, it is very important to ensure that infrastructure is delivered as part of a comprehensive site wide strategy. It is more appropriate and sustainable if each development parcel is delivered in accordance with site wide infrastructure strategies for the entirety of each allocation.

United Utilities wishes to highlight the difficulties which it has observed in the delivery of co-ordinated approaches to strategic sites between different landowners. On those sites which are in fragmented land ownership, United Utilities would encourage the Council to challenge landowners to demonstrate clearly how they will work together to deliver a co-ordinated approach to the delivery of sustainable development. It is most appropriate and effective to have this question resolved in advance of allocation and in advance of adoption of the plan. Many of the strategic sites may necessitate a need for upfront investment in infrastructure. In the absence of clear partnership agreements between landowners, it may be very difficult to secure a mechanism to fairly forward fund the delivery of upfront infrastructure. Development can be most appropriately and sustainably delivered if it is clear that landowners on sites where ownership is fragmented will work together as part of a cohesive site wide strategy. This is a key factor in considering the deliverability of sites in the most sustainable manner.

I trust these comments are self-explanatory however, if you wish to discuss further please do not hesitate to contact me on 01925 731 319. I would be grateful if you confirm receipt.

Yours sincerely

**Jenny Hope  
United Utilities  
Developer Services and Planning**