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KNOWSLEY LOCAL PLAN: CORE STRATEGY EXAMINATION

MATTER 2: SPATIAL STRATEGY

WRITTEN STATEMENT ON BEHALF OF UNITED UTILITIES

REPRESENTOR NO.: 106/127

HEARING DATE: 5 NOVEMBER 2013

Issue: Whether the strategy of development within urban areas (focusing on regeneration areas) followed by urban extensions to meet longer term needs, represents a sustainable approach to growth which pays sufficient regard to the environmental and other constraints of the borough.

Q2.2 Is the strategy sufficiently 'spatial'?

We have argued that the need to provide opportunities for employment growth in Knowsley for the benefit of the Liverpool City Region is under represented. Sustainable economic growth will be based on creating opportunities for inward investors as well as indigenous business. The spatial dimension for employment growth opportunities is significant. This is why we are promoting the rational expansion of Axis Business Park, a location with unparalleled links to the trunk road network which can accommodate business in need of large premises at a strategic location. We believe that it was premature to dismiss this opportunity at an early point in the Green Belt Study. A more spatial perspective would have emphasised the significance of land at Axis Business Park as a strategic location for employment. This would align with the objective (in Policy CS1) of 'maximising Knowsley's contribution to the development of the Liverpool City Region'.

In relation to the Liverpool City Region the Local Plan recognises Liverpool SuperPort as a key enterprise sector. Logistics space is key to the SuperPort. Knowsley is well placed to meet some of the demand but its competitive advantage as a location will only be fulfilled if it can deliver sites that sit along the M57 corridor, such as the key location at Axis Business Park.

Q2.4 Is the strategy for the Green Belt in Policy CS1 consistent with the National Planning Policy Framework (NPPF)? Does the use of Green Belt land for development satisfy the 'exceptional circumstances' test of national policy and if so, for what reason? Should the use of Green Belt land be limited to meeting long term needs

The NPPF urges local planning authorities, when reviewing Green Belt boundaries, to take account of the need to promote sustainable patterns of development. The review of Green Belt boundaries should only take place in exceptional circumstances.

The promotion of a sustainable pattern of development and the need to review Green Belt boundaries only in exceptional circumstances need to be considered in parallel. The Council has placed a considerable emphasis throughout the preparation of the Local Plan on the planning rationale for meeting demonstrable development needs through adjustments to the Green Belt boundary. The opportunities in existing built up areas are constrained and do not give sufficient capacity for the full period of the Local Plan. If objectively assessed need for housing, employment and other uses is to be met then Green Belt release is the only realistic option. This is the essence of the exceptional circumstances argument. The need to achieve a sustainable pattern of development from the release of Green Belt land is the second dimension. The economic role of sustainable development includes 'ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation' (NPPF Paragraph 7).

We make the strong argument in representations that the failure to release Green Belt land at Axis Business Park would be a significant missed opportunity as it provides an unparalleled opportunity for a sustainable approach to meeting economic needs. Moreover, this opportunity needs to be brought forward in the short to medium term. There is already a paucity of sites in the Liverpool City Region to meet the strategic needs of large logistic users. No other site in Knowsley has similar characteristics. Nowhere else can provide the same competitive advantage.

Similarly the social role of sustainable development will be served by the release of Green Belt sites which can strengthen communities and meet current housing needs. We argue that land at Carr Lane will provide housing to galvanise the regeneration initiatives at South Prescot. This is an important core principle of the Local Plan. Development at Carr Lane can clearly assist in the broad strategy of regenerating and restructuring a significant area of land across the South Prescot Regeneration Area. In the interest of promoting self-sustaining development and of boosting the supply of housing there is no justification for delaying the release of the Carr Lane broad location to a late point in the Local Plan. The arguments for early release of this land are compelling.

Suggested Changes

Policy CS1 Spatial Strategy for Knowsley

1e. A review of Green Belt boundaries to meet the strategic need for employment land, to broaden the opportunity for development in or adjacent to the Principal Regeneration Areas and to meet longer term needs for housing and employment development, and maintaining the openness of remaining Green Belt areas.

This change would align Policy CS1 with the emphasis in NPPF on the delivery of sustainable development and reinforce a strategy which seeks to meet the priority development needs which have been objectively assessed (employment development, job creation and regeneration). The change would make this part of the Local Plan sound and consistent with National Planning Policy.