

KNOWSLEY LOCAL PLAN: CORE STRATEGY EXAMINATION

MATTER 4: EMPLOYMENT PROVISION

WRITTEN STATEMENT ON BEHALF OF UNITED UTILITIES

REPRESENTOR NO.: 106/127

HEARING DATE: 8 NOVEMBER 2013

Issue 1 **Whether the proposed amount of employment development meets the objectively assessed needs of the borough.**

Q4.1 **Is the methodology based on historic provision realistic?**

It is accepted in the Planning for Growth Technical Report that there is a potential weakness in the use of historic take up rates as a basis for assessing requirements. They can be skewed by short term trends and are not at all sensitive to the needs of emerging employment sectors. This is a matter which is discussed by CBRE (on behalf of United Utilities) in a separate written statement. It concludes that the emerging trend for large scale industrial and logistics users in the Liverpool City Region cannot be accounted for by a reliance on an analysis of the long-term historic take up rates.

Q4.3 **Is there justification for a 20% flexibility allowance?**

For the reasons given above in answer to question 4.1 there is a justified need for flexibility in the supply of employment land. This is consistent with the guidance in NPPF concerned with meeting the needs of a changing development market and particularly meeting the needs of significant inward investors. The basis of our argument is that there is insufficient recognition of the potential to be gained from the rising trend of large scale employment uses in the Liverpool City Region. This is why we are promoting land at Axis Business Park as a broad location for employment development. A choice of employment sites is vital through the period of the Local Plan. In Knowsley the choice of sites is skewed towards smaller parcels of land (Appendix A of Technical Report). There is a requirement for greater flexibility to meet the specific needs of large industrial or logistics enterprises. The provision of employment land at Axis Business Park to meet this identified need would be complementary to other opportunities arising from the remodelling of Industrial Parks, but development at Axis will only be realised if there is more flexibility in the approach to employment land.

Issue 3 **Whether the KLPCS is sufficiently clear, effective and robust to ensure timely delivery of employment development and consistency with national policy.**

Q4.7 **The justification for the release of land from the Green Belt**

In order to limit the release of land from the Green Belt to meet employment needs there is significant emphasis given to the remodelling of Industrial Parks as a way of contributing to the supply of employment land. This is legitimate but it will not meet the needs of all enterprises or inward investors and some of the remodelling could be geared towards expansion of existing businesses only. The need for flexibility has been explained in answers to Question 4.3. To give essential flexibility in the overall range and choice of employment sites there is an overriding need to consider sustainable locations in the Green Belt. In our submissions we have made the case that land at Axis Business Park is a highly sustainable location for new enterprise with the benefit of existing infrastructure. This location can meet the needs of inward investors in the Liverpool City Region looking for opportunities that are directly accessible to the trunk road network. The release of this location from the Green Belt to support economic growth should be given significant weight. It would be consistent with pro-actively meeting the development needs of business (NPPF Paragraph 20). It would also be important in meeting the needs of inward investors over the plan period (NPPF Paragraph 21), particularly the needs of emerging sectors. In short, there is sound justification for the release of land from the Green Belt to meet a shortfall in employment land supply but there is also justification for adding Axis Business park to the portfolio of locations. If locations such as this are not considered then the Local Plan is failing to meet the needs of significant and emerging business. The objective of sustainable economic development underpins these arguments. The need for sustainable economic development opportunities in Knowsley provides the exceptional circumstances to justify the release of land from the Green Belt.

Q4.8 **The mechanism for phased release of employment land**

There is a compelling argument that, if the objective of sustainable economic growth is to be realised, then a restrictive phasing mechanism should be avoided. For indigenous business and inward investors a choice of available sites is paramount when it comes to making investment decisions. To restrict choice through phasing the release of employment land would run counter to the objective of proactively meeting the development needs of business. The economy of Knowsley is best served by providing as wide a choice as is justified.

Suggested Changes

Policy CS4

In relation to the distribution of development for employment use it should be made clear that sites to be removed from the Green Belt to meet the strategic needs of inward investors should be considered for development at any stage through the period of the Local Plan. A phasing mechanism is neither necessary or justified.

This change would make this policy of the Local Plan sound in that it would enable the delivery of sustainable economic development, proactively meeting the needs of business, in accordance with the policies of the NPPF.