

The Supplementary Information is effectively an extension of the quantitative analysis of employment land. It does not address a number of key issues raised at the Examination Hearing sessions including:

- (1) The need for more flexibility in the identification of employment land.

A helpful starting point is NPPF paragraph 20 which urges local planning authorities to plan proactively to meet the development needs of business. The proactive approach calls for significant flexibility in the portfolio of employment sites that are available at any one time. The identified supply in Knowsley is too constrained and generally of low quality (see below). The supply needs to better match the needs of a modern economy. There is a need for flexibility, a fact recognised in the relevant evidence base (the Joint Employment Land and Premises Study).

- (2) The need to meet the specific and exacting needs of priority employment sectors.

NPPF at paragraph 21 requires local planning authorities to set out a clear economic vision and strategy to encourage sustainable economic growth. In Knowsley the Economic Regeneration Strategy 2012 – 2015 provides the vision and strategy. It aims ‘to promote the conditions of sustainable economic growth’ and ‘to establish Knowsley as a location of choice where people want to live and businesses want to invest’. One of the Target Sectors is ‘transport, communication and distribution including freight movements, logistic services and warehousing’. The Supplementary Information does not extend to explaining how the particular needs of this Target Sector and others set out in the Economic Regeneration Strategy will be met in a proactive way. The planning policy is reactive rather than proactive in addressing the needs of the logistics sector. The identified employment land supply does not include a range of sites which are suited to the locational requirements of logistics. If expansion land and South Prescot are discounted then only the former Sonae site (ref. 984) and Alchemy (ref. 103) amongst the range of urban sites are of the scale required by many inward investors (over 8ha in area) in the logistics sector and the Sonae site must be secondary given its location and its association with waste end users. In the Liverpool City Region it is particularly important that complementary logistics development to the Liverpool Superport is given support. At the core of the Superport is the new deep water container facility at the Port of Liverpool. For Knowsley there is a key role in the identification of sites that are located to take advantage of the link to the Port of Liverpool along the M57 corridor.

- (3) The deficiencies in the employment land supply are not explored and explained.

The quantitative review masks deficiencies in the supply of employment land opportunities but it does show that:

- (i) There is a large number of small, incidental sites which are only appropriate as infill. They are of insufficient capacity and often in secondary locations and will often not be suited to the needs of modern industry, especially manufacturing and logistics. Many have a low market attractiveness score. The viability of new investment will be a constraint.
- (ii) A significant part of the employment land supply is expansion land for existing businesses. This has a value but it is long term and bespoke. This land is of no value to the indigenous employers or inward investors looking for good quality employment land in Knowsley.

- (iii) In the first five years the quality of the range of sites is of secondary status. A symptom of this is the discount factor that has been applied which is often fifty percent or above. This places considerable doubt on the ability to deliver investment over this period.

If these three matters are brought together – the need for flexibility in the supply of employment land, the need to meet the exacting requirements of the inward investing logistics sector and the shortage of larger scale, primary sites – then the case for bringing Axis Business Park into the balance is strengthened. It is at a primary location, is in single ownership, benefits from infrastructure and services and is deliverable now. This is in contrast to some other identified strategic employment locations which will only be brought forward after a significant lead time, are in multiple ownership and require substantial investment in new infrastructure.

It is the best placed location in Knowsley to meet the needs in the City Region for logistics or large scale manufacturing businesses. It is particularly well placed to support the Liverpool Superport initiative where there is a key requirement to provide logistics floorspace along the M57 corridor. In terms of profile and accessibility Axis Business Park has its advantages over Knowsley Industrial Park which is shown in the Knowsley Economic Regeneration Strategy as having some potential to meet the increasing demand for warehouse space arising from the Liverpool Superport project.

Land at Axis Business Park would make a significant and immediate contribution to overcome some of the shortfalls and deficiencies in the employment land supply in Knowsley. We believe that the market interest will be substantial should Axis be released from the Green Belt. Strong approaches have already been made to United Utilities by TJ Morris and Barwood.