

**KNOWSLEY LOCAL PLAN
CORE STRATEGY EXAMINATION**

Matter 4 Issue 3: Employment Provision

**Smiths Gore on behalf of
The Knowsley Estate
(ID ref 72)**

October 2013

Knowsley Local Plan Core Strategy – Examination Hearings

These representations are submitted on behalf of The Knowsley Estate and are in response to the Submitted Knowsley Local Plan Core Strategy and minor changes published in July 2013. The submitted representations seek to address the Matters and Issues identified by the examination Inspector as set out below.

Overall it should be noted that the Knowsley Estate broadly support the plan and its overall strategy and there is little between the Council and our client. However, where there are differences these relate to the core strategy's ability to respond appropriately to the need to deliver housing and employment land in a timely manner and in a manner consistent with the National Planning Policy Framework's (NPPF) requirement to meet the full objectively assessed need for market and affordable housing in the housing market area and to "boost significantly the supply of housing." (NPPF para. 47).

The Knowsley Estate owns land within the Knowsley Local Plan area and there are three sites under the Estate's ownership which have been assessed and reviewed through the Council's Green Belt Technical Report. These sites have been assessed by the Council as being suitable for Green Belt release and our client concurs with this view. Our client is committed to bringing forward these development sites to support the housing and employment land needs of the borough and is pleased to be working with the Council to secure the delivery of these sites. The land owner envisages these sites will bring forward high quality and inclusive design as sustainable developments to the benefit of the area, its residents and visitors.

Matter 4: Employment Provision

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

1. On behalf of our client we generally support the aims of the strategy to meet employment needs and to support both established markets and emerging sectors and to encourage mixed use housing and employment schemes.
2. Our client's concern regarding employment land provision, as with housing, relates to the timely release of sites. Given that we consider there has been an under provision of housing land within the plan and in particular a restriction on the availability of housing land within the first five years of the plan period rendering the plan unsound in this respect, it is appropriate that the consequent release of housing land should be supported by release of employment land.
3. As Knowsley's housing provision has not the matched annual requirement since 2003 equally there has been a poor employment land take-up since 2003. The Council's Employment Technical Paper considers this is likely to have been due to a lack of deliverable attractive sites. It is notable that other Merseyside authorities have not experienced a similarly reduced take-up of employment land as evidenced in the Joint Employment Land and Premises Study (2010).
4. The plan should appropriately match housing land supply provision with available employment land provision and to provide not just a quantitative supply but a qualitative supply of land. NPPF at paragraph 152 advises local authorities to seek net gains in economic, social and environmental dimensions of sustainable development.
5. Policy CS 4 advises that a total of 183.5 ha of land will be identified for employment uses across the plan period. Similarly to the housing policy no new sites are to be identified in the short to medium term and land supply is focused within the existing urban area. Only longer term employment needs are to be catered for by the release of sites from the Green Belt. Whilst the policy approach is quantitatively led at paragraphs 2 and 3 paragraph 4 refers to a qualitative element (i.e. a range of sites and premises by size, location type and suitability for different employment uses).

6. The phasing element of the policy at paragraph 4 fails to identify any trigger points for the release of new employment sites to address qualitative or quantitative issues. As such the policy lacks clarity, it is not positively prepared or focused on delivery and is ineffective and therefore unsound. In this regard the plan appears entirely reactive rather than forward planning.
7. The 2010 Knowsley Economic Regeneration Strategy recognises the need for the borough to rebalance its employment base away from an over-reliance on the public sector jobs and encourage growth in other sectors including advanced manufacturing, business and financial services, logistics and distribution and low carbon technologies. However, the existing portfolio of employment sites is unlikely to attract these users.
8. Both site KGBS 4, land east of East Knowsley Industrial and Business Park and site KGBS 7 Knowsley Lane, Huyton are assessed in the Council's Green Belt Technical Report for employment (31ha) and mixed residential/employment use respectively. The report concludes there are exceptional circumstances for both sites to be released from the Green Belt to provide for development needs to 2028 and we fully agree with the Council's assessment in this regard.
9. Both sites are located with easy access to the M57 and M62. Site KGBS 4 in particular is well placed to provide a prestigious gateway site to Huyton and has the opportunity to make an important contribution to attracting the knowledge-based industries or logistic and distribution sectors sought. Site KGBS 7 as a mixed use development will be instrumental in supporting the regeneration objectives of Huyton. These sites should therefore be available to the market at an early stage in the plan and should form allocations.
10. Policy CS 4 as presently drafted does not meet the tests of soundness, it is not positively prepared, it is not effective as its phasing requirement lacks clarity and it is not consistent with National policy. Policy CS 4 should be reworded at paragraphs 2, 3 and 4 to state:

"2. A total of 183.5 hectares of land will be identified for employment uses between 2010 and 2028 to be located ~~initially~~ within the urban area ~~primarily within~~ focused on the following locations:

- Knowsley Industrial Park (including Knowsley Business Park);
- Huyton Business Park;
- Kings Business Park;

- South Prescott; and
- Jaguar Land Rover (Halewood).

and at the allocations at Policy CS 5 to be developed in line with Policy CS 2 'Development Principles'.

~~3. A review of Green Belt boundaries is also proposed to meet a proportion of the longer term needs, Sites removed from the Green Belt for this purpose will only be developed in line with the overall development principles in Policy CS 2 'Development Principles' and the phasing mechanisms set out below and in policy CS 5 'Green Belt'.~~

Phasing of Release of Land for Employment Uses

~~4. The release of land for employment development will be phased to ensure that there is at all times;~~