APPENDIX B

East of Halewood Supplementary Planning Document and Masterplan

Report of Consultation

March 2020

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Executive Summary

1. This Consultation Report has been produced by Knowsley Council following a six week period of consultation on the draft East of Halewood Supplementary Planning Document and draft Masterplan, held from February to April 2019

2. The report summarises the consultation processes undertaken, including the activities required by legislation and the Council's own commitments to engage members of the public and stakeholders in the preparation of planning documents. This included:

    - Establishment of a consultation website and online comments form;
    - Letters to neighbouring properties;
    - Letters / emails to Local Plan database and statutory consultees;
    - Site notices, posters and adverts;
    - Information point in neighbouring leisure centre and hard copy documents in local libraries and One Stop Shops;
    - Social media, community messaging and business newsletter; and
    - Drop in public consultation events, attended by approximately 100 individuals.

3. In total, 104 responses to the consultation were received, either through the website, by email or by letter. The majority of responses were received from members of the public, while responses were also received from selected statutory agencies, landowners and developers with an interest in the site, neighbouring businesses and other respondents.

4. The responses received raised a wide variety of matters; the focus of comments from members of the public and local businesses was on concerns about local impacts of the development of the site, for example on traffic, community facilities, residential amenity and existing commercial operations. Landowner and developer comments generally focussed on seeking detailed changes to the documents, and expressed concerns about the deliverability of the Council's proposals. Statutory consultees sought changes to the documents related to their specific technical areas of interest.

5. The main body of the Consultation sets out the full detail of the issues raised by respondents to the consultation, the Council's response to the points made. In many cases, changes to the document were not considered necessary, as the matter being raised has already been addressed appropriately within the consultation draft documents. The instances where changes to the Supplementary Planning Document and Masterplan were considered appropriate are logged here and the changes have subsequently been included in the final versions of documents for approval.

1. Introduction

1.1 This Consultation Report has been produced by Knowsley Metropolitan Borough Council (KMBC) following a statutory period of public consultation on the draft East of Halewood Supplementary Planning Document (SPD). The Council also published a Draft East of Halewood Masterplan for consultation alongside the draft SPD. This report includes the Council's response to written comments received during the consultation period, and any resultant changes to the SPD and Masterplan.

1.2 The draft East of Halewood SPD has been prepared in accordance with a number of legislative and regulatory requirements, including those within the Town and Country Planning (Local Planning) (England) Regulations (2012) and the Planning and Compulsory Purchase Act 2004 (as amended). Furthermore KMBC provides additional guidance on consultation within the planning process within its adopted Statement of Community Involvement (2007).

1.3 This regulatory background does not apply to the draft East of Halewood Masterplan; however given the close relationship between the two documents, and as this document has been prepared alongside the draft SPD, it was considered appropriate to undertake the consultation simultaneously on both documents.

1.4 The draft SPD and Masterplan were subject to appropriate stakeholder engagement during its production and was subsequently published for a six week public consultation period between 28 February and 10 April 2019.

Structure of this document

1.5 This document sets out the stakeholder engagement and public consultation undertaken by KMBC in the process of preparing the East of Halewood SPD and Masterplan.

1.6 The document is structured as follows:

- Policy and Regulatory Requirements
- Consultation Methods
- Consultation Results overview
- Detailed comments and Council response

Purpose of the East of Halewood SPD and Masterplan

1.7 KMBC adopted the Knowsley Local Plan: Core Strategy on 6 January 2016 and a new set of planning policies became part of the Statutory Development Plan for Knowsley. The Core Strategy allocated a number of former Green Belt sites as "Sustainable Urban Extensions" (SUEs).

The Core Strategy required that an SPD and Masterplan were prepared for the three largest SUE sites including the site referred to as East of Halewood.

1.8 The East of Halewood SPD sets out the Council's development, design and infrastructure requirements for the East of Halewood SUE site. This is to help set a more detailed framework outlining how the Core Strategy's policy requirements can be met in preparing a masterplan for the site, and to inform subsequent planning applications.

1.9 As set out in Core Strategy Policy SUE2, proposals for development will only be granted planning permission where they are consistent with a single detailed Council-approved masterplan for the whole of the East of Halewood site. This Council has prepared such a detailed masterplan alongside the East of Halewood SPD. This document includes a range of detailed spatial development frameworks, as well as a design and local distinctiveness guide.

2. Policy and Regulatory Framework

2.1 A Supplementary Planning Document ("SPD") is a non-statutory planning document, designed to work alongside a Local Planning Authority's ("LPAs") Local Plan. The purpose of a SPD is to provide detailed guidance for development proposals. Although a SPD does not form part of the Local Plan itself, once in place a SPD will become material consideration in the determination of planning applications.

2.2 The Government sets out guidance for SPDs in a number of statutory documents. Those referenced are the National Planning Policy Framework (2012), The Town and Country Planning (Local Planning) (England) Regulations (2012) and the Planning and Compulsory Purchase Act (2004) (as amended). Furthermore KMBC provides additional guidance on consultation within the planning process within its adopted Statement of Community Involvement (2017).

National Policy

National Planning Policy Framework

2.3 The National Planning Policy Framework ("NPPF") sets out the Government's planning polices for England and how they are to be applied.

2.4 The NPPF sets out its expectations for Local Plans to be prepared with the objective of contributing to the delivery of sustainable development. In addition, supplementary planning documents should be used where they can help applicants to make successful applications or aid infrastructure delivery.[1]

2.5 Supplementary Planning Documents are defined in the NPPF as:

> *"Documents which add further detail to the policies in the Local Plan* [in this case the Knowsley Local Plan Core Strategy]. *They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan."*

The Town and Country Planning Regulations (2012)

2.6 The Town and Country Planning (Local Planning) (England) Regulations published in 2012 (referred to as the 2012 Regulations), stipulate in

[1] https://www.gov.uk/guidance/national-planning-policy-framework/plan-making#para153

Regulation 12(a) that before adopting an SPD, the local planning authority must prepare a statement setting out:

(i) The persons the local planning authority consulted when preparing the supplementary planning document;
(ii) A summary of the main issues raised by those persons; and
(iii) How those issues have been addressed in the supplementary planning document.[2]

2.7 In accordance with Regulation 12(a), this consultation statement lists those consulted in the preparation of the draft East of Halewood SPD by KMBC.

2.8 In addition, Regulation 12(b) of the 2012 Regulations sets out a requirement to make copies of the Consultation Statement and the SPD available in accordance with Regulation 35 together with details of:

(i) the date by which representations must be made (being not less than 4 weeks from the date the local planning authority complies with this paragraph), and
(ii) the address to which they must be sent[3]*.*

2.9 In accordance with Regulation 12(b), 13 (c), 35 and 36 of the 2012 Regulations, a consultation period of 6 weeks for the draft East of Halewood SPD was undertaken and Draft SPD documents were made available as follows:

- Online at https://consultations.knowsley.gov.uk
- In hard copy at Council One Stop Shop receptions and Libraries in Huyton and Halewood.

Habitats Regulation Assessment (HRA) and Strategic Environmental Assessment (SEA)

2.10 The 2012 Regulations do not require a Sustainability Appraisal to be carried out on SPDs. However, under separate regulations, the Council must formally consider in a screening document whether SPDs require a Habitat Regulation Assessment (HRA) and/or a Strategic Environmental Assessment (SEA).

2.11 In response, formal screening documents were prepared to accompany the draft SPD, albeit based on a previous version of the SPD. Comments on screening documents were invited from the statutory nature conservation bodies, including Natural England and Natural Resources Wales during the consultation. The screening documents have been updated following the public consultation period on the SPD.

[2] [2] http://www.legislation.gov.uk/uksi/2012/767/pdfs/uksi_20120767_en.pdf
[3] http://www.legislation.gov.uk/uksi/2012/767/pdfs/uksi_20120767_en.pdf

Local Policy and Guidance

Statement of Community Involvement

2.12 The Planning and Compulsory Purchase Act (2004) requires Councils to produce a policy document called a Statement of Community Involvement (SCI). This document sets out the Council's approach to community consultation as part of the development plan making process and gives guidance to appropriate consultation methods.

2.13 KMBC adopted its revised SCI in 2017. In the adopted SCI, KMBC define the process of preparing and consulting on a Supplementary Planning Document (SPD) to meet the regulations of the Town and County Planning (Local Planning) (England) Regulations 2012.

2.14 A summary of minimum consultation requirements for SPDs, as set out in the SCI, is set out below:

- Consultation on draft SPD for 6 weeks
    - materials available on the Council's website
    - hard copy documents on deposit in selected One Stop Shops and libraries
    - email and mail out to Local Plan database
    - specific and general consultee bodies notified as appropriate (see SCI table 2).

2.15 A detailed summary of consultation activity undertaken by KMBC during the pre-production phase is provided in the next chapter of this document.

3. Consultation Methods

Pre consultation period

3.1 Early engagement with key stakeholders on the emerging draft East of Halewood SPD and draft Masterplan was carried out in accordance with the requirements of the Council's SCI. This is explained within the **Pre Consultation Statement** published alongside the draft SPD and Masterplan, and within the **Masterplan Options and Preferred Options report**. These are all available to review on the Council's website at:

https://consultations.knowsley.gov.uk

Consultation period

3.2 Once produced, and following formal approval from the Council, the draft East of Halewood SPD and draft East of Halewood Masterplan were subject to a six week period of consultation from **Thursday 28 February 2019 until Wednesday 10 April 2019**. This formal consultation was undertaken in accordance with the relevant requirements as outlined in section 2 of this report. The six week consultation period exceed the minimum of four weeks required by the regulations, but aligned with the recommended six weeks outlined within the Knowsley SCI.

3.3 During this period and in accordance with Regulation 12(b), 13(c), 35 and 36 of 2012 regulations, the consultation statement and the draft screening documents were made available for review, alongside the draft SPD. In addition, the draft Masterplan, and a range of masterplan supporting documents were also made available for review.

3.4 These documents were available to view:

- Online at https://consulations.knowsley.gov.uk;
- In hard copy at Council One Stop Shop receptions and libraries in Huyton and Halewood;
- In hard copy at Halewood Leisure Centre.

3.5 A summary of consultation and engagement activities undertaken during the six-week consultation period is set out below:

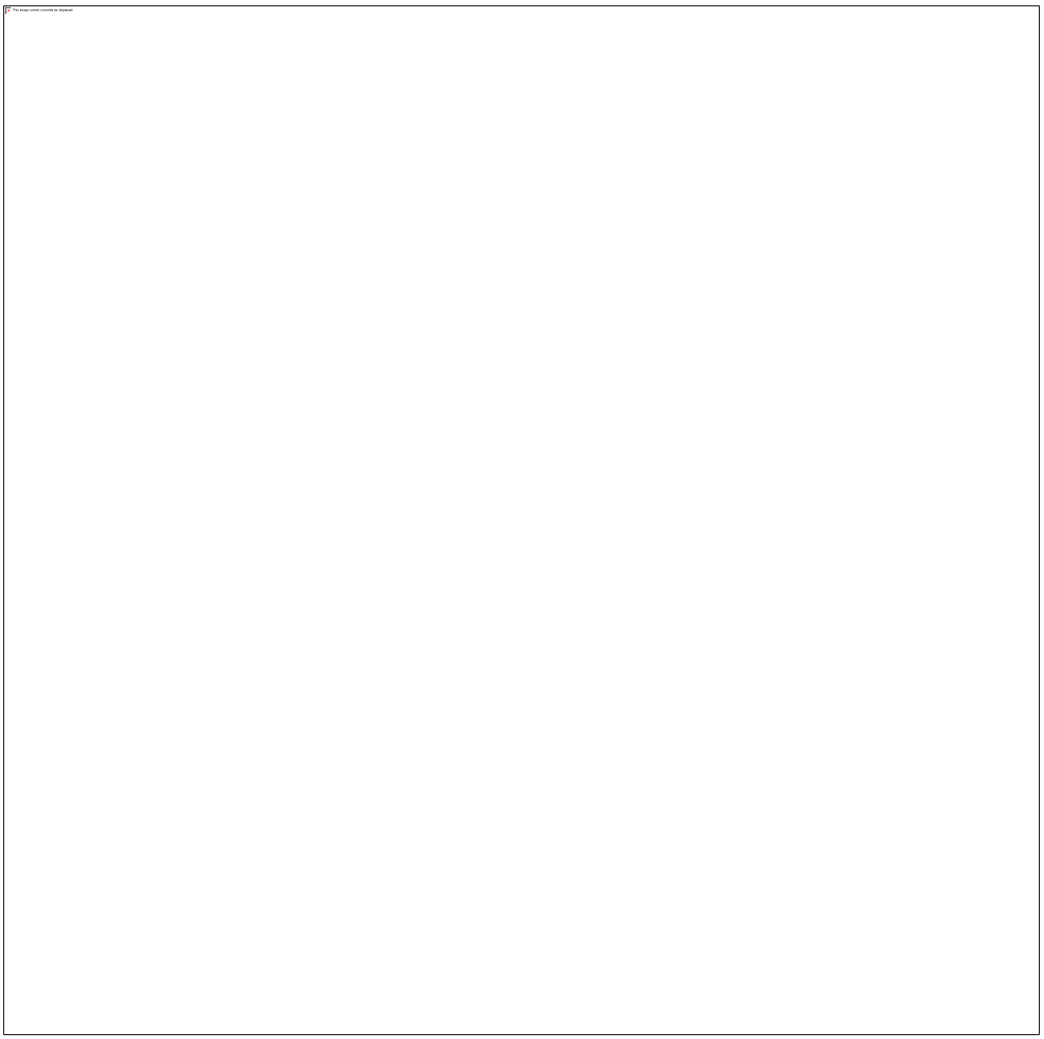
- Publicising the Consultation
- Consultation Events
- Feedback Channels

Publicising the Consultation

Resident / business letter drop

3.5 The Council sent letters of notification to 1223 properties (both residential and business addresses), within the site, and within 200m of the site boundary. Figure 3.1 below shows the spatial extent of properties notified. The notification explained that the consultation had started, how to view documents and submit comments, and when consultation events were taking place.

Figure 3.1: Plan showing properties receiving direct notification by letter



Local Plan database and statutory consultees

3.7 The Council sent emails (or where email addresses were not available, posted letters) to all registered members of the Knowsley Local Plan consultation database. This includes all statutory consultees, as well as those who have previously registered a wish to be notified about

consultation on the Council's planning documents. This resulted in 130 emails and 10 letters being sent.

Landowners and developers

3.8 Notifications were sent by email (or letter) to known landowners within the East of Halewood site, and where applicable, their known agents. The Council also directly consulted the developers with a known interest in the site. This resulted in a further 55 notifications being issued.

Site notices, Posters and One Stop Shop adverts

3.9 Site notices were placed around the site boundary, explaining that the consultation had started, and how to get involved, including via the Council's website, public drop in events, etc. Posters were placed in public buildings, again advertising the consultation, and notifications were placed on screens in Council One Stop Shops around Knowsley.

3.10 A dedicated consultation space was set up in the reception of Halewood Leisure Centre; this hosted pull up plans and a screen, showing the Council's promotional video and slides about the proposals and how to get involved.

Social Media, Community Messaging and Business Newsletter

3.10 The Council's social media channels, including Facebook, Twitter and Instagram were used to advertise the consultation. Posts were placed at the start of the consultation, to advertise drop in events, and to remind followers about the close of the consultation. The consultation was also promoted using the Council's community messaging service. The Council's business growth team also advertised the consultation to Knowsley's business community via their newsletter, circulated to local businesses.

Press coverage

3.11 The consultation was covered the following publications:

- Knowsley News – 28 February 2019
- Place Northwest - 1 March 2019
- Horse and Hound magazine – 12 March 2019
- The Telegraph – 17 March 2019

- YM Liverpool – 28 March 2019

Consultation Events

3.12 The Council held two public drop-in events; during these events, Council officers and members of the project team were on hand to answer the questions of attendees. These events were as follows:

- Wednesday 13 March 2019, 3pm – 7pm, Halewood Leisure Centre
- Saturday 16 March 2019, 10am – 2pm, Halewood Leisure Centre

3.13 During the exhibition events, further information on the SPD and Masterplan was on display and feedback forms were available for attendees to complete.

3.14 In total, circa **100** people attended the public consultation events including local residents and stakeholders.

Consultation website

3.15 A dedicated website was created to host consultation documents and a promotional video, and to allow the public to make comments of the draft document. The website included the following information:

- Downloadable PDF documents including: the main consultation documents, community involvement documents, environmental assessments, background reports and evidence base reports;
- Details of the feedback channels (including link to online comments form);
- Details of the public drop in events.

Feedback Channels

3.16 In order to ensure stakeholders could provide feedback on the draft SPD and Masterplan during the consultation period, a number of feedback channels were provided. These included:

- A postal address: East of Halewood consultation, Yorkon Building, Huyton, Merseyside, L36 9FB (postage required)
- A dedicated email address: eastofhalewood@knowsley.gov.uk
- Online comments form (available via https://consultations.knowsley.gov.uk)

3.17 The response form was made available during the consultation period in hard copy at both the consultation events, and at Halewood and Huyton One Stop Shops and Libraries, and at Halewood Leisure Centre. Both a

PDF and Microsoft Word version were available on the consultation website.

3.18 All materials published explained that they could be made available in other formats or languages, on request.

4. Consultation Results Overview

4.1 This Chapter sets out analysis of the feedback received during the consultation period (28 February 2019 to 10 April 2019).

Feedback received –overall statistics

4.2 A total of 104 items of feedback were received from local members of the public and businesses, statutory consultees and landowners/developers. The number of comments received per consultee is summarised in **Table 4.1.**

Table 4.1: Feedback received per type of consultee

Consultee	Number of submissions	% of overall submissions
Members of the public	83	80%
Businesses	3	3%
Statutory Consultees	11	10%
Landowners/developers	5	5%
Other	2	2%
Total	104	100%

4.3 Feedback received ranged from brief emails and comment forms through the website, to more detailed letters and reports. The number of comments received per format is summarised in **Table 4.2.**

Table 4.2: Form of response received

Form of response	Number of submissions	% of overall comments
Comment on website	73	70%
Email	23	22%
Letter	8	8%
Total	104	100%

Members of the Public

4.4 A total of 83 submissions from members of the public were received during the consultation period. Many of the submissions contained a number of different thematic comments.

4.5 For ease of analysis and reporting, feedback has been grouped into themes. The number of comments received per theme is summarised in **Table 4.3**. It should be noted that a number of responses received included comments relating to more than one theme.

Table 4.3: Theme of members of the public comments received.

Theme	Number of comments
Highways and traffic – general	47
Education	36
Residential development – general	34
Residential amenity	31
Highways and traffic – specific routes / junctions	26
Healthcare / health issues	23
Public transport	17
Ecology / wildlife	15
Flooding / drainage	15
Residential development – type and tenure	13
Retail facilities	12
Other community facilities and services	12
Open spaces	7
General objection	6
Air Quality	6
Consultation process	5
Site boundary	4
Noise / light pollution	4
Commercial development	3
Design matters	3
Climate change	2
Developer contributions – general	1
Total comments	322
Average comment per submission (322/83)	3.9

- Detailed issues raised under each theme, and the Council's response, including any necessary changes to the SPD or Masterplan are set out in in section 5.

Local Businesses

4.4 A total of three submissions were received during the consultation period from local businesses as follows:

- Indigo Planning for Jaguar Land Rover
- WYG for Everton FC
- Yew Tree Farm

4.5 Detailed issues raised by each submission, and the Council's response, including any necessary changes to the SPD or Masterplan are set out in in Table 5.2.

Statutory consultees.

4.6 The statutory consultees responding to the consultation included:

- Canal and River Trust
- Coal Authority
- Environment Agency
- Halewood Town Council
- Highways England
- Historic England
- Homes England
- Natural England
- Network Rail
- Sport England
- United Utilities

4.7 Of these, the Canal and River Trust, the Coal Authority and Homes England did not make any substantive comments.

4.8 Detailed issues raised by each submission, and the Council's response, including any necessary changes to the SPD or Masterplan are set out in in Table 5.3.

Landowner and Developers

4.9 The landowners/developers responding to the consultation included:

- Lichfields on behalf of Bellway Homes Ltd, Redrow Homes Ltd, Miller Homes Ltd, Linda Mary McLean, Trustees of the M Leary life interest 1997 settlement, Trustees of the R Leary life interest 1997 settlement, RSPCA Liverpool Branch
- Cass Associates / Lea Hough on behalf of Trustees of the M Leary life interest 1997 settlement, Trustees of the R Leary life interest 1997 settlement

- Savills on behalf of the Hesketh Estate
- Indigo Planning on behalf of GLP Limited
- Trustees of land at Hough Green, Widnes

4.10 The following statutory consultees are also landowners within the site, their responses have been analysed as statutory consultees:

- United Utilities
- Environment Agency
- Network Rail

4.11 Detailed issues raised by each submission, and the Council's response, including any necessary changes to the SPD or Masterplan are set out in in Table 5.4.

Other respondents

4.12 Other responses not fitting into the above categories included:

- Merseyside Environmental Advisory Service
- Knowsley Older People's Voice

4.13 Detailed issues raised by each submission, and the Council's response, including any necessary changes to the SPD or Masterplan are set out in in Table 5.5.

5. Detailed Comments and Council Response

5.1 This chapter sets out the Council's response to the feedback received during the consultation period and how the feedback has been reflected through amendments to the final East of Halewood SPD and East of Halewood Masterplan.

5.2 For ease of reference, a table is provided for each group of consultees which provides a response from the Council:

A. Members of the Public–**Table 5.1 – Page 14 to 43**

B. Local Businesses – **Table 5.2 Page 44 to 54**

C. Statutory Consultees – **Table 5.3 Page 55 to 103**

D. Landowner/Developers – **Table 5.4 Page 104 to 273**

E. Other respondents – **Table 5.5 Page 274 to 281**

Table 5.1: Members of the Public – detailed comments and Council response

Theme	Detailed comments	Instances raised in submissions	Council Response	Changes to the SPD	Changes to the Masterplan
General	General objection – development should be stopped	3	The East of Halewood site was allocated in the Knowsley Local Plan Core Strategy for residential development. The Council's position is that development of the site should go ahead in accordance with its site specific SPD and Masterplan, and within the planning process.	No	No
	General objection – Council has gone against the wishes of Halewood residents	3	We acknowledge the level of objection in the local community, both at this stage and earlier at the Local Plan stage. As now, objections covering matters material to the planning process have been considered fully.	No	No
	Total	**6**			
Consultation process	Concern over lack of consultation / awareness of the Local Plan stage	2	The Council consulted fully on its Local Plan, evidence of this is set out on our website. This included consultation significantly about the statutory minimums. In addition, consultation on the draft SPD and Masterplan have exceeded minimum levels, as explained within this report.	No	No
	Question whether the consultation can be extended post-election to allow the new Council to consider the proposals	1	The draft SPD and Masterplan will be subject to formal approvals process, allowing for consideration of the proposals by Cabinet and Planning Committee respectively.	No	No
	Concern over lack of transparency in the process	1	The purpose of consultation on the draft SPD and Masterplan is to allow for community scrutiny of the Council's proposals. Supporting documents transparently explain the process to date. Similarly, the process of dealing with	No	No

Theme	Detailed comments	Instances raised in submissions	Council Response	Changes to the SPD	Changes to the Masterplan
			future planning applications will include the requisite level of transparency and community consultation.		
	No notices of intent have been sent out	1	The term “notice of intent” is not a recognised part of the planning process.	No	No
	Total	**5**			
Site boundary	Objection due to lack of inclusion of particular property (still within the Green Belt) within the Sustainable Urban Extension	1	The extent of the East of Halewood site was set within the Local Plan, and hence the masterplan and SPD relate only to the area identified therein. It is not possible to include any further land or properties within this boundary without a new Local Plan process to change the boundary.	No	No
	Objection due to the loss of green belt land for residential development	4	The land within the East of Halewood site is not within the Green Belt and has not been since 2016, therefore this is not a relevant objection.	No	No
	Total	**4**			
Residential development - general	Objection due to availability of existing houses, including empty homes, hence no need for new development	4	The East of Halewood site was allocated for residential development within the Local Plan in 2016, in response to the requirement to identify sufficient housing land in Knowsley up to 2028. The need for new homes in Knowsley was clearly established as part of this process.	No	No
	Objection due to the amount of homes when new homes have already been completed in Halewood, e.g. nearby Goddard Chase.	2	The supply of housing in Halewood, including at Goddard Chase, was known at the point the site was allocated. There are no grounds for review of the need for new housing at East of Halewood due to nearby developments being	No	No

Theme	Detailed comments	Instances raised in submissions	Council Response	Changes to the SPD	Changes to the Masterplan
			completed.		
	Objection due to the availability of alternative sites with less negative impacts, including brownfield sites	4	The availability of housing land, including brownfield land, was considered in detail at the Local Plan stage; however it was concluded that greenfield and Green Belt sites were still needed to ensure adequate supply of housing land to 2028. The East of Halewood site is allocated for residential development.	No	No
	Objection due to older population soon moving to alternative accommodation, leaving family houses vacant.	1	The turnover and vacancy rate within the housing stock in Knowsley was considered as part of the Local Plan evidence base. There are no grounds for review of the need for new housing at East of Halewood due to vacancies.	No	No
	Concern over whether the potential population increase due to new proposed homes is plausible at a time of Council budget cuts.	1	The Council has indeed experienced substantial funding cuts over recent years. Increased population does increase demands on services, but new homes also bring funding to the Council through Council Tax and new homes bonus. Additional economically active residents also bring benefits to local businesses and sustain local amenities.	No	No
	Objection as the proposal only includes housing land and not space for schools, doctors, dentists or shops.	1	The land uses within the site are limited to residential development and public open space, except to the south of the site where potential commercial uses may also be considered appropriate. However the masterplan makes clear the Council's intention to seek contributions towards education and healthcare facilities – please see delivery section of the	No	No

Theme	Detailed comments	Instances raised in submissions	Council Response	Changes to the SPD	Changes to the Masterplan
			masterplan for further details.		
	Objection due to the local community not wanting more houses.	1	It is acknowledged that new development is not always wanted by all members of the community; however the evidence established at the Local Plan stage justified the allocation of the East of Halewood site for new housing, based on evidence of needs and demands for Knowsley to 2028.	No	No
	Objection due to the scheme being a money making development (including for the Council)	4	The Council does not own any land identified for residential development – the only land the Council owns is Finch Woods, which will be retained as public open space. Therefore there is a no capital receipt due to the Council from the sale of development land. The Council will receive Council Tax and New Homes Bonus funding, which will go towards funding essential services. The site is likely to be developed by private sector businesses, which will need to generate a profit.	No	No
	Objection due to the proposals resulting in urban sprawl, including encroachment on Widnes	5	This issue was considered fully at the Local Plan stage, in particular with respect to purpose of land within the Green Belt. It was concluded that the East of Halewood site could be developed.	No	No
	Objection due to the number of homes compared to the available local amenities – requires reconsideration; concern that number of homes represents an	6	Concerns about impacts on local amenities are noted, hence the Council's position in seeking to deliver improvements – for example to education and health care services – to mitigate the impact of the development. Please see delivery section the masterplan for more details.	No	No

Theme	Detailed comments	Instances raised in submissions	Council Response	Changes to the SPD	Changes to the Masterplan
	overbearing impact on Halewood				
	Inconsistency in the number of homes being proposed	1	This is noted; the number of homes to be delivered within East of Halewood is stated as at least 1,100 and up to 1,500 in the draft SPD. The masterplan refines this further, giving a range of between 1,250 and 1,500 new homes, based on our understanding of the developable area, and an appropriate density range.	No	No
	Suggest that builders could look at modular building options	1	The Council has no objection to this form of building in principle, as long as such options could demonstrate overall compliance with the policy framework including the masterplan and SPD. It is not considered necessary or appropriate to limit development within East of Halewood to this type of construction.	No	No
	Support for plots to be set aside for self-builders	1	The Council does not currently have a policy basis to require that land be set aside for self or custom build properties within the East of Halewood site. Opportunities for this type of development are being considered as part of the Council's wider obligations in accordance with national legislation.	No	No
	Support for the use of farming land, which is not natural or providing public amenity	1	Noted.	No	No
	Support for new housing	1	Noted. The East of Halewood site is in close	No	No

Theme	Detailed comments	Instances raised in submissions	Council Response	Changes to the SPD	Changes to the Masterplan
	especially with access to nearby jobs		proximity to a range of employment centres, closely situated by Jaguar Land Rover / Estuary Business Park and at Halebank / 3MG in Halton.		
	Total	**34**			
Residential development – type and tenure	Supportive of new market housing for those currently privately renting	1	Noted. The East of Halewood site will provide significant numbers of new market housing.	No	No
	Support for affordable housing options, including smaller homes for those on living wage	1	Noted. As per the Council's adopted policy, we will seek that 25% of new homes be provided in affordable tenures. A mix of size of homes will also be sought – please see masterplan for further details.	No	No
	Support for help to buy options	1	Help to Buy is a government initiative rather than a policy of the Council. Its availability on the East of Halewood site will depend on the longevity of the programme, and whether the housebuilders will offer this option for prospective purchasers.	No	No
	Support for new housing to help mitigate national shortage	1	Noted. The Council has a requirement to provide sufficient housing land, hence its Local Plan site allocations, including East of Halewood.	No	No
	Concern that provision of affordable housing needs to be explained more, whether rented or homes for sale; question over what type / size of homes will be	2	The level of detail about affordable housing to be provided is reasonably high level within the masterplan, setting overall targets and indicative size splits. However final details will only be known at the planning application stage.	No	No

Theme	Detailed comments	Instances raised in submissions	Council Response	Changes to the SPD	Changes to the Masterplan
	provided, and how many of each type / size				
	Concern over affordability of new housing, whether this will help young people or first time buyers into new homes, or be affordable for those in lower paid jobs	3	Noted. The Council's policy is that 25% of new homes will be affordable, meaning a mix of affordable home ownership products, and affordable rented homes. This is reflected in the masterplan.	No	No
	Concern that most of the new homes will not be affordable	1	The Council's policy is that 25% of new homes are affordable. The majority of homes within East of Halewood are likely to be brought forward as market homes for sale.	No	No
	Concern about whether new homes will be purchased by buy to let landlords, suggest leverage of planning approval to insist builders sell to those who will be living there	1	It is understood that the three housebuilders with an interest in the site intend to sell individual market homes to householders; no bulk sale to private landlords is currently planned. However the Council has no control over onward sale of private property in the future.	No	No
	Concern about whether new homes will be freehold or leasehold	1	Since the Council is not selling land for housing within this development, the Council has no landowner control over whether homes are sold as freehold or leasehold. However it is our understanding that all three volume house builders involved in East of Halewood intend to sell their market homes as freehold.	No	No
	Question whether the long term provisions for an ageing population have been	1	There is flexibility to deliver new supported accommodation within the East of Halewood site, subject to some restrictions on type and	No	No

Theme	Detailed comments	Instances raised in submissions	Council Response	Changes to the SPD	Changes to the Masterplan
	considered.		location of accommodation due to COMAH guidance. However it is the Council's understanding that there is currently sufficient extra care accommodation in Halewood, according to the published sufficiency strategy, so no specific minimum provision is promoted within the masterplan.		
	Total	**13**			
Commercial development	Support for Higher Road site being uses for pub / restaurant and convenience store	1	While this individual support is noted, this is the opposite of the position noted below. The Masterplan will retain flexibility for these uses to come forward, subject to them meeting planning requirements.	No	No
	Objection due to the community not wanting more shops or pubs	1	While this individual objection is noted, this is the opposite of the position noted above. The Masterplan will retain flexibility for these uses to come forward, subject to them meeting planning requirements.	No	No
	Concern about use of site adjacent to Aldersgate Drive for hotel or family pub, this could contribute to anti-social behaviour and litter	1	These concerns are noted, and can be reflected through additional masterplan guidance geared towards ensuring that the design of any mixed use scheme minimises the risks opportunities for anti-social behaviour.	No	Added content to the design guide for non-residential uses that ASB / litter risks be addressed through design – link to principles of designing out crime and secured by design.

Theme	Detailed comments	Instances raised in submissions	Council Response	Changes to the SPD	Changes to the Masterplan
	Total	**3**			
Highways and traffic – general	General objection due to increased traffic levels and congestion, impacts on sustainability.	23	We acknowledge that increased development brings increased vehicular movements and demands for public transport. There is scope to improve key routes and junctions, to help mitigate the impact of this increase – this is set out within the masterplan. Detailed Transport Assessments and Travel Plans will be used to analyse the highways network and justify the securing of appropriate mitigation measures as and where appropriate.	No	No
	Objection due to increased traffic bringing increased risk of accidents	2	As above, it is acknowledged that new development will generate additional traffic. The masterplan seeks to set out how routes can be improved, including addressing safety concerns arising from an increased level of traffic. Detailed Transport Assessments, Travel Plans and Road Safety Audits will be used to analyse the highways network and justify the securing of appropriate mitigation measures as and where appropriate.	No	No
	Concerned with traffic rat runs	1	The proposed highway layout within the East of Halewood masterplan has been designed with the purpose of reducing the opportunity for rat running, while maintaining accessibility and permeability of the site.	No	No
	Objection due to the lack of resilience in the local highway if the A5300 is closed / busy	4	This is noted. There is scope to improve key routes and junctions, to help mitigate the impact of traffic increases – this is set out within the masterplan. Detailed Transport Assessments	No	No

Theme	Detailed comments	Instances raised in submissions	Council Response	Changes to the SPD	Changes to the Masterplan
			and Travel Plans will be used to analyse the highways network and justify the securing of appropriate mitigation measures as and where appropriate.		
	Objection due to disruption caused by construction traffic	1	Constructing up to 1,500 new homes will necessarily generate construction traffic. Detailed planning applications will need to be accompanied by construction management plans, geared towards minimising the negative impacts of construction traffic on the local highway network. These will need to be approved by the Council before development can start.	No	No
	Objection due to negative impact on Higher Road, including Baileys lane roundabout and junctions extending to Mackets Lane, this route is already gridlocked	3	We acknowledge that increased development brings increased vehicular movements. There is scope to improve key routes and junctions, to help mitigate the impact of this increase – this is set out within the masterplan. Detailed Transport Assessments and Travel Plans will be used to analyse the highways network and justify the securing of appropriate mitigation measures as and where appropriate.	No	No
	Objection due to small lanes not being able to cope with additional traffic	5	This is noted. Detailed Transport Assessments and Travel Plans will be used to analyse the highways network and justify the securing of appropriate mitigation measures as and where appropriate.	No	No
	Objection due to the existing condition of roads and	2	This is an existing matter for the Council as Local Highway Authority to consider and is	No	No

Theme	Detailed comments	Instances raised in submissions	Council Response	Changes to the SPD	Changes to the Masterplan
	pavements		outside the remit of this masterplan process to address; it would not be appropriate to seek developer funding to address existing problems.		
	Concern over what traffic calming measures will be included	2	The need for traffic calming and speed reduction in some areas is noted. Any traffic calming proposals that arise will be the subject of related statutory consultation processes.	No	No
	Support for proposed road network and traffic calming measures	1	Noted.	No	No
	Concern about how the plan minimises trips by private car	1	The proposals include for the provision of extensive sustainable transport infrastructure and connections to reduce travel by private car. This includes a new bus route within the site. Furthermore Travel Plans will also be used to promote sustainable choices.	No	No
	Concern that key junctions will be overloaded. During peak times there are issues associated with vehicles seeking to avoid congestion.	1	This is noted. There is scope to improve key routes and junctions, to help mitigate the impact of traffic increases – this is set out within the masterplan. Detailed Transport Assessments and Travel Plans will be used to analyse the highways network and justify the securing of appropriate mitigation measures as and where appropriate.	No	No
	Concern that no by-pass routes are planned, so question how the increase in traffic will be dealt with	1	As noted above, there is scope to improve key routes and junctions, to help mitigate the impact of traffic increases – this is set out within the masterplan. At the current time, it is not	No	No

Theme	Detailed comments	Instances raised in submissions	Council Response	Changes to the SPD	Changes to the Masterplan
			considered necessary to investigate options for a bypass in Halewood. Detailed Transport Assessments and Travel Plans will be used to analyse the highways network and justify the securing of appropriate mitigation measures as and where appropriate.		
	Total	**47**			
Highways and traffic – specific routes / junctions	Objection due to Greensbridge and Cartbridge lanes being unsuitable for increased traffic	4	This is noted. Detailed Transport Assessments and Travel Plans will be used to analyse the highways network and justify the securing of appropriate mitigation measures as and where appropriate.	No	No
	Objection due to increased traffic at school start and finish times, funerals at the church, football games	2	This is noted, however the introduction of improvement schemes would need to be related to the impact of the East of Halewood development. Detailed Transport Assessments and Travel Plans will be used to analyse the highways network and justify the securing of appropriate mitigation measures as and where appropriate.	No	No
	Crossings needed: - on Hollies Road - on Church Road	5	This is noted, however the introduction of new crossings would need to be related to the impact of the East of Halewood development. Detailed Transport Assessments and Travel Plans will be used to analyse the highways network and justify the securing of appropriate mitigation measures as and where appropriate.	No	No
	Objection due to alignment of Baileys Lane, which is	3	This is noted. This stretch of Baileys Lane will include two new junctions, including an indicated	No	No

Theme	Detailed comments	Instances raised in submissions	Council Response	Changes to the SPD	Changes to the Masterplan
	dangerous and has severe bends, and exit from Baileys Reach		signalised junction which will slow the traffic down here. Detailed Transport Assessments and Travel Plans will be used to analyse the highways network and justify the securing of appropriate mitigation measures as and where appropriate.		
	Concern that parking restrictions on Lower Road and Baileys Lane will require introduction and enforcement	1	Any parking restriction proposals that arise will be the subject of related statutory consultation processes.	No	No
	Concern over traffic flow on Lower Road, junction improvements, and impacts over ability to access properties	1	This is noted. There are two new junctions proposed on Lower Road, which will slow down traffic here. Any works will need to respect access to existing properties. Detailed Transport Assessments and Travel Plans will be used to analyse the highways network and justify the securing of appropriate mitigation measures as and where appropriate.	No	No
	Concern that access on to Lower Road is onto a fast road, hence risk of accidents	1	This is noted. There are two new junctions proposed on Lower Road, which will slow down traffic here. Detailed Transport Assessments, Travel Plans and Road Safety Audits will be used to analyse the highways network and justify the securing of appropriate mitigation measures as and where appropriate. It is envisaged that a reduction of the speed limit on Lower Road (in-part) will be promoted.	No	No
	Concern over impact on key	1	This junction is already identified in the	No	No

Theme	Detailed comments	Instances raised in submissions	Council Response	Changes to the SPD	Changes to the Masterplan
	junctions that are already difficult – Church Road/Lower Road and Baileys Lane		masterplan as likely to require improvement. Detailed Transport Assessments and Travel Plans will be used to analyse the highways network and justify the securing of appropriate mitigation measures as and where appropriate.		
	Concern that junction of Church Road with Baileys lane and Greensbridge Lane is not mentioned for improvement	1	This junction is already identified in the masterplan as likely to require improvement. Detailed Transport Assessments and Travel Plans will be used to analyse the highways network and justify the securing of appropriate mitigation measures as and where appropriate.	No	No
	Concern that proposed access points off Greensbridge Lane are unsafe, suggest use of roundabout and an access onto Lower Road	1	The Council's initial assessments and proposals put forward to date by developments have indicated that the proposed access arrangements can work; the existing roundabout is unable to provide an adequate spur into the development site.	No	No
	Access on to Baileys Lane needs to ensure good visibility	1	This is noted. The broad locations for accesses onto Baileys Lane should allow for suitable visibility, confirmation will subject to detailed design.	No	No
	Suggest footpath needed on whole of Finch Lane	1	This is noted. The proposals include for a parallel footpath within the development site itself, which is considered preferential, to separate pedestrians and vehicles.	No	No
	Objection to access on to Aldersgate Drive due to potential increase in anti-	1	This is noted. Direct access is proposed from Higher Road as part of the proposed layby closure. Access from Aldersgate Drive is an	No	Final masterplan clarifies access arrangements for

Theme	Detailed comments	Instances raised in submissions	Council Response	Changes to the SPD	Changes to the Masterplan
	social behaviour and crime, and congestion for residents – access should be on Higher Road, further away from residential properties		option only for new residential traffic.		land off Higher Road and Aldersgate Drive.
	Objection to proposed bike path near Aldersgate Drive and link to New Hutte Woods due to concerns about anti-social behaviour.	3	This is noted. The final masterplan shows an alternative alignment for the cycleway, avoiding direct link to New Hutte Wood.	No	Cycleway section in southern part of the site is shown on different alignment within final masterplan.
	Total	**26**			
Public transport	Concern that strain on poor public transport is making the area less attractive to residents	1	The proposals include for the promotion of enhanced public transport facilities that would benefit new and existing communities. This includes a new bus route through the site and provision for subsidised bus service.	No	No
	Concern over poor public transport provision (including to Baileys Lane roundabout)	4	The proposals include for the promotion of enhanced public transport facilities that would benefit new and existing communities. This includes a new bus route through the site and provision for subsidised bus service.	No	No
	Objection due to lack of sustainable transport options in comparison to other parts of Knowsley, Halton and Liverpool – non car journeys are not reliable	4	The proposals include for a suite of measures to actively promote sustainable transport options and sustain existing public transport services. This includes a new bus route through the site and provision for subsidised bus service. Halewood railway station is also in close proximity.	No	No

Theme	Detailed comments	Instances raised in submissions	Council Response	Changes to the SPD	Changes to the Masterplan
	Concern about lack of plans to extend bus services further to Higher Road, support for a new service which utilises lay by, offering services to Liverpool and stations, bus service could also use redundant land in the leisure centre site	1	The proposals include for the promotion of enhanced public transport facilities that would benefit new and existing communities. This will be the subject of future detailed discussions in terms of precise proposals. This includes a new bus route through the site.	No	No
	Question whether railway station on Hesketh land has been declined as a proposal	1	A preliminary feasibility report was commissioned by Merseytravel and whilst it did not discount such a facility, it identified significant challenges to viability and delivery. This proposal has therefore not been included in the East of Halewood SPD or masterplan.	No	No
	Support for potential improved public transport links (bus and rail)	1	Noted and welcomed.	No	No
	Suggest that rail authorities are approached to consider options for shuttle to Hunts Cross Station, or new mini station by Lower Road, which would free up buses for cross regional services.	1	Merseytravel as the Integrated Transport Authority have been consulted on the proposal. In order to be included within the masterplan, there would need to be clear evidence that such a service is needed to mitigate the impacts of the development at East of Halewood, which is likely to be challenging.	No	No
	Support for new public transport links to jobs at Speke / Jaguar.	1	Noted and welcomed.	No	No

Theme	Detailed comments	Instances raised in submissions	Council Response	Changes to the SPD	Changes to the Masterplan
	Concern over lack of accessibility by public transport to hospitals	1	As noted above, the proposals include for the promotion of enhanced public transport facilities that would benefit new and existing communities.	No	Final masterplan states that efforts should be made to ensure that public transport routes connect to key facilities; further detail on provision of bus service also provided
	Total	**17**			
Developer contributions – general	Question whether figures for funding from developers have been agreed yet, or whether this will be agreed after the houses are built.	1	The draft masterplan included initial proposals for developer contributions, which will be refined and then presented alongside the final masterplan. As noted within the masterplan, the exact developer contributions will need to be agreed as part of the planning application process- before development takes place.	No	Final masterplan includes details of developer contributions asks
	Total	**1**			
Education	Objection due to local schools already being at capacity	20	The impact of the East of Halewood scheme on primary and early years / childcare places has been recognised within the Local Plan, SPD and draft masterplan. This will be addressed through seeking developer contributions towards extensions to existing facilities.	No	No
	Objection due to existing lack of choice in school places, which will be exacerbated, children will	3	The impact of the East of Halewood scheme on primary and early years / childcare places has been recognised within the Local Plan, SPD and draft masterplan. This will be addressed	No	No

Theme	Detailed comments	Instances raised in submissions	Council Response	Changes to the SPD	Changes to the Masterplan
	have to seek places outside of Knowsley		through seeking developer contributions towards extensions to existing facilities.		
	Consider new development will require new primary school	2	This is noted; the masterplan acknowledges the need for new primary and early years/ childcare places.	No	No
	Concern that new education facilities will require the use of green belt land	1	There is no proposal for any use of Green Belt land for any purpose in association with the East of Halewood site.	No	No
	Objection due to quality of existing schools	1	This issue cannot be addressed through the East of Halewood scheme.	No	No
	Concern about where new education will be provided due to COMAH restrictions, lack of space at existing schools, inaccessibility of other parts of Knowsley	1	Noted. This is part of the rationale for ensuring that school places are provided through expansion of existing facilities rather than through a new build school within the site.	No	No
	Concern that proposed solution to seek developer contributions is not good enough of viable, there is insufficient space for expansion and no guarantee new teachers will be available	3	New development cannot fund new teachers – it can only fund the provision of built space within schools. The impacts on financial viability of the overall scheme will be assessed as part of the final masterplan; additional flexibility on viability necessarily has to be incorporated at the application stage, however the inability to delivery school places would need to be weighed in the planning balance – please see the Developer Contributions SPD for further details of this process.	No	No

Theme	Detailed comments	Instances raised in submissions	Council Response	Changes to the SPD	Changes to the Masterplan
	Concern from residents about congestion and parking at Plantation school, hence an expansion at this school will add to these issues; St Marks and Halewood CofE are land locked	1	Such matters would be carefully considered as part of any subsequent school expansion proposals (which would be subject to separate additional planning application requirements) for any given site and mitigation secured if and as appropriate.	No	No
	Concern over ability to expand existing primary schools, including risks associated with potential loss of playing fields	1	This is noted. The schemes for expanding primary schools will need to be worked up alongside the finalisation of developer contributions due from the scheme. There is a formal process to be followed for the loss of any playing field space, which would need to be reflected in this process.	No	No
	Objection due to lack of sixth form provision in Halewood	2	The Local Education Authority has advised that the contributions needed from East of Halewood are towards primary education and early years' education.	No	No
	Consider new development will require reopening sixth form provision	1	The Local Education Authority has advised that the contributions needed from East of Halewood are towards primary education and early years' education.	No	No
	Total	**36**			
Health care / health issues	Objection due to local doctors and dentists being at capacity / existing waiting times	17	The impact of the East of Halewood scheme on GP services places has been recognised within the Local Plan, SPD and draft masterplan. This will be addressed through seeking developer contributions towards extensions to existing	No	No

Theme	Detailed comments	Instances raised in submissions	Council Response	Changes to the SPD	Changes to the Masterplan
			facilities.		
	Consider that development will require new GP surgery within the site	1	Following consultation with the Knowsley Clinical Commissioning Group, there is sufficient vacant space within The Halewood Centre to bring back into use for GP surgery space. This Centre is in close proximity to the East of Halewood site. Hence it would not be justifiable to seek the delivery of a brand new surgery building within the site.	No	No
	Concern that proposed solution to seek developer contributions towards health care is not good enough or viable, due to lack of staff/doctors	2	The question over viability of contributions sought towards health care is considered in the final masterplan. As for education, developer contributions can pay for capital build or refurbishment costs, they cannot pay for revenue funding of staff. The NHS receives formula funding based on population growth.	No	No
	Objection due to loss of green belt / grazing land and access to horses and negative impact on mental health and wellbeing, consequent social care impacts	3	The allocation of the site was confirmed in the Local Plan 2016 and hence the loss of Green Belt is no longer a relevant issue. As set out in the masterplan, the development of the East of Halewood site will result in the net gain of publically accessible open space, including significant investment in Finch Woods, offering higher quality space for recreation.	No	No
	Total	**23**			
Retail facilities	Objection due to the existing retail facilities being too busy / overused, with insufficient parking	8	The popularity of the existing shopping centre is acknowledged. The centre is near to East of Halewood, but outside the area of the masterplan. Any proposals to expand the	No	No

Theme	Detailed comments	Instances raised in submissions	Council Response	Changes to the SPD	Changes to the Masterplan
			shopping offer or increase parking in response to increased demand would need to be dealt with on a case by case basis. Meanwhile, the masterplan offers the opportunity for commercial development – potentially including small scale retail and family pub uses – south of the A562, which could help diversify the retail offer in Halewood.		
	Objection due to limited food shops in the area	1	As above, the masterplan offers the opportunity for commercial development – potentially including small scale retail and family pub uses – south of the A562, which could help diversify the retail offer in Halewood.	No	No
	Support for development as local shops will benefit	1	Noted.	No	No
	Concern that new retail or commercial premises will increase likelihood or crime and anti-social behaviour	1	This is noted, and would be a significant consideration in the detailed design of any new retail or commercial development. Masterplan content can be strengthened in this area.	No	Additional masterplan content around designing out crime has been added.
	Question whether new convenience shops could include support for parade on Baileys Lane, in need of modernisation	1	The parade on Baileys Lane is outside of the area covered by the masterplan, and it is not the remit of the masterplan to prescribe an improvement scheme for this parade, however businesses in this location will benefit from additional customers within the East of Halewood site.	No	No
	Total	**12**			
Other	Objection due to police	3	These matters are for Merseyside Police to	No	Additional

Theme	Detailed comments	Instances raised in submissions	Council Response	Changes to the SPD	Changes to the Masterplan
community facilities and services	station being inaccessible and concern over lack of funding to police these new areas		consider. Design of new development will consider opportunities to reduce crime and the fear of crime, and anti-social behaviour. Masterplan content can be strengthened in this area.		masterplan content around designing out crime has been added.
	Objection due to concern over lack of facilities to keep teenagers entertained and keep young people off the streets, including whether there is funding for schemes	2	The masterplan proposals include substantial public open space, including facilities for recreation within Finch Woods and the leisure centre. No specific community buildings are proposed, however there are facilities within the wider Halewood settlement available for use.	No	No
	Objection due to current leisure facilities being out dated and over-priced – suggest new playground and football pitches are needed	1	These proposals are already included within the masterplan – please note references to play area installation at Finch Woods, and improvements to pitches at Halewood Leisure Centre.	No	No
	Suggest opportunity to open new cafes, pubs, restaurants	2	The masterplan offers the opportunity for commercial development – potentially including family pub uses – south of the A562 Higher Road, which could help diversify the leisure opportunity in Halewood.	No	No
	Objection to the loss of the RSPCA facility, requires a re-site	4	The decision of the RSPCA Liverpool Branch to close is their business decision, as is the decision not to open another centre. The Liverpool Branch is supportive of the allocation of the land at East of Halewood for housing.	No	No
	Total	**12**			
Residential	Objection due to overall	5	Respecting the residential amenity of existing	No	No

Theme	Detailed comments	Instances raised in submissions	Council Response	Changes to the SPD	Changes to the Masterplan
amenity	negative impact on Halewood residents, making the place less attractive to live in; lack of consideration given to the local community		residents is a key part of the masterplan; one of the central objectives is focussed on delivering high quality in the built form that makes a positive impact on Halewood. Enhanced community facilities, including public open space, transport links, schools and health care provision will be delivered through new development, to the benefit of new and existing communities.		
	Objection due to Halewood's charm and character being lost	1	The masterplan seeks to enhance the character of Halewood, in particular the Halewood Lane Ends area, which includes older properties.	No	No
	Objection due to removal of open spaces and village feel of the area	1	Most of the land is in private ownership and not accessible. The masterplan incorporates substantial new public open space, including an enhanced and expanded Finch Woods; access to open space will actually increase following the completion of the development.	No	No
	Objection due to loss of rural feel and surrounding countryside, and the destruction of the beautiful nature of the land	9	The site at East of Halewood was removed from the Green Belt and allocated for residential development in 2016 – hence the loss of agricultural land for new development was agreed at this stage. However the masterplan seeks to respond to the rural setting of the site, in particular the countryside edge. Please see masterplan design guidance for further details.	No	No
	Objection due to the loss of visual amenity currently provided by the site	2	As noted above, the change in the visual amenity provided by the site was agreed when the site was allocated for development. The	No	No

Theme	Detailed comments	Instances raised in submissions	Council Response	Changes to the SPD	Changes to the Masterplan
			masterplan is geared towards securing a visually attractive residential development, as well as open spaces which will provide visual and functional amenity for new and existing residents.		
	Concern about existing problems in the local area, including crime, anti-social behaviour, and the risk of this increasing	9	Design of new development will consider opportunities to reduce crime and the fear of crime, and anti-social behaviour. Masterplan content can be strengthened in this area.	No	Additional masterplan content around designing out crime has been added.
	Objection due to reduction in house value for existing residents	3	This is not a material consideration for the planning process.	No	No
	Objection due to disruption during the construction period	1	Constructing up to 1,500 new homes will necessarily generate construction activity over a prolonged period. Detailed planning applications will need to be accompanied by construction management plans, geared towards minimising the negative impacts of construction on local residents, including the highway.	No	No
	Total	**31**			
Climate change	Objection due to loss of land to alleviate impacts of climate change	1	This is noted. The planning process already accounts for this matter, through requiring sustainable drainage systems which mimic the function of greenfield land. Some additional references to low carbon technologies have been added to the final Masterplan, along with reference to the Council's recently declared climate emergency.	No	Additional content added to the final masterplan on low carbon technologies.

Theme	Detailed comments	Instances raised in submissions	Council Response	Changes to the SPD	Changes to the Masterplan
	Objection due to the risk of flooding becoming worse through climate change	1	This is noted. The masterplan includes the provision of a flood storage area adjacent to Ditton Brook, which is future proofed to allow for flooding event increases due to climate change.	No	No
	Total	**2**			
Ecology / wildlife	Objection due to impact on wildlife currently living within the site	9	Impacts on wildlife and ecology are considered within the masterplan, with further surveys being required at the planning application stage. Provision is made for ecological mitigation within the designated nature improvement area. The document also includes an extensive planting and habitats strategy geared towards boosting biodiversity.	No	No
	Concern over whether hedgerows will remain	1	The masterplan explains that some hedgerows within and around the site are earmarked for retention where possible, reflecting their historic status and their role in adding local character as well as habitats.	No	No
	Concern over the loss of grazing land and countryside which supports wildlife and insects	5	The site at East of Halewood was removed from the Green Belt and allocated for residential development in 2016 – hence the loss of agricultural land for new development was agreed at this stage. However as noted above, the masterplan includes various measures to enhance habitats and support biodiversity, particularly within open spaces.	No	No
	Total	**15**			
Open Spaces	Support for new connections to open spaces such as	1	Noted and welcomed.	No	No

Theme	Detailed comments	Instances raised in submissions	Council Response	Changes to the SPD	Changes to the Masterplan
	Finch Woods				
	Support for new play and recreational areas with adequate management being provided	2	Noted and welcomed.	No	No
	Support for provision of new public green space, which will have benefits beyond aesthetic ones	1	Noted and welcomed. The provision of purposeful greenspace is at the heart of the masterplan.	No	No
	Objection to the provision of more open spaces when existing spaces aren't used	1	The Council's planning policy requires new greenspace to be provided as part of new development. The provision of well-connected purposeful greenspaces is at the heart of the masterplan.	No	No
	Objection due to the loss of greenspaces resulting from the project	2	The only public open space within the site – Finch Woods – will be retained and enhanced in this use. There is therefore no loss of formal greenspace as a result of the masterplan; rather there will be a significant net gain in publically accessible greenspace.	No	No
	Total	**7**			
Design matters	Support for garages being located adjacent to properties rather than in back gardens	1	Noted and welcomed.	No	No
	Support for the inclusion of energy saving measures and	1	Noted and welcomed.	No	No

Theme	Detailed comments	Instances raised in submissions	Council Response	Changes to the SPD	Changes to the Masterplan
	electric vehicle charging points				
	Support for maximisation of useful living space in new homes, including allowing for future extensions	1	This is noted. The detailed design of new homes will be considered as part of the planning application process.	No	No
	Total	**3**			
Air Quality	Concern over air quality, including loss of green space to naturally improve air quality and Halewood being surrounded by poor air quality, causing respiratory problems	5	There are currently no air quality management areas in Halewood. However air quality assessments will need to be submitted with planning applications, to provide further local evidence and details of any appropriate mitigation.	No	No
	Objection due to increase in traffic bringing increased pollution	1	As above – and traffic improvement plans can also play a positive role in mitigating congestion which in turn will mitigate negative impacts on air quality.	No	No
	Total	**6**			
Flooding / drainage	Objection due to likelihood of exacerbated drainage / flooding problems	4	It is acknowledged that there are significant flood risk constraints affecting the northern part of the site, adjacent to Ditton Brook. The masterplan includes proposals to address these constraints, through the creation of a flood storage area, which is not proposed for development, and which will result in a reduction of the area subject to flood risk. The masterplan also includes extensive content on drainage, including sustainable drainage strategy	No	No

Theme	Detailed comments	Instances raised in submissions	Council Response	Changes to the SPD	Changes to the Masterplan
			elements which are geared towards reducing the risk of surface water flooding.		
	Concern that even if permeable materials are used, it is a risk to build on flood plain	1	Please see above response – the proposed flood storage area is designed to ensure that no residential development will take place on areas at risk of fluvial flooding. Due to the underlying soil conditions, it is not proposed that permeable surfaces are used – the masterplan has been updated to reflect this.	No	Removed references to permeable surfaces within the masterplan.
	Concern that drainage solutions will not work due to tidal influence on the brook	1	The Council is aware of the tidal influence of the brook, and this has been accounted for in flood risk modelling to date.	No	No
	Concern over surface water flooding on Church Road, extra run off	1	The masterplan proposes the use of sustainable urban drainage systems, which are designed to mimic the rate of surface water run-off from a green field site. This means that surface water flooding risk in surrounding areas should not be exacerbated by the development.	No	No
	Concern over proposed flood risk mitigation being insufficient, including maintenance responsibilities for new ponds and ditches	2	Drainage features will need to be designed to allow for ease of future maintenance. Future maintenance of drainage and flood risk mitigation within the site will need to be provided by developers or by an appropriate authority (such as United Utilities, should facilities be adopted by them). This is set out in the masterplan.	No	No
	Concern that planning for drainage has been	1	Drainage and flood risk mitigation modelling accounts for the likely future impact of climate	No	No

Theme	Detailed comments	Instances raised in submissions	Council Response	Changes to the SPD	Changes to the Masterplan
	undertaken optimistically that climate change may not happen		change and extreme weather events. Please see details within the masterplan and baseline report; further detail will be required at the planning application stage.		
	Question whether the Council has approaches agencies with expertise in water dispensation	1	The Council has the role of Lead Local Flood Authority and also consults with statutory agencies including the Environment Agency and United Utilities.	No	No
	Request resident compensation and insurance policy	4	These matters are outside of the planning process.	No	No
	Total	**15**			
Noise / light pollution	Objection due to noise pollution and light pollution	3	The masterplan provides that all external lighting should be designed to avoid light pollution – please design guide section of the document. Sources of noise, including railways and highways (and now adjacent industrial uses) are considered within the constraints identified in the masterplan, and appropriate mitigation proposed, subject to further testing at the planning application stage.	No	No
	Concern that residents will complain about noise associated with kennels	1	The RSPCA Liverpool Branch facility closed in May 2019, hence removing this source of noise from the site. With respect to the Merseyside Dogs Home, we understand that this is likely to remain, and hence may require noise mitigation – this is noted in the masterplan. However it should also be noted that the main developable parcels identified within the masterplan are	No	No

Theme	Detailed comments	Instances raised in submissions	Council Response	Changes to the SPD	Changes to the Masterplan
			some distance from the kennels.		
	Total	**4**			

Table 5.2: Local Businesses – detailed comments and Council response

Local Business	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
Indigo Planning (Jaguar Landrover)	Jaguar Land Rover support the Council's ambition for an SPD and Masterplan which set out a vison for the East of Halewood SUE. However, our main concerns relate to the 'Hesketh Lane' land parcel (herein referred to as 'Hesketh Lane') as identified in the draft Masterplan, south of the A562, Higher Road and the implications the development of this land could have on Jaguar Land Rover's existing and future operations at Halewood. As currently drafted, Jaguar Land Rover do not support the provision of mixed-use development, in particular residential dwellings, within 'Hesketh Lane', given the proximity to the boundary of Jaguar Land Rover Halewood, the existing Westcoast Mainline and Jaguar Land Rover 's rail sidings. Draft policy EH2: East of Halewood masterplan in the draft SPD requires the masterplan to be accompanied by technical reports which identify the constraints, potential impacts and proposed mitigation. Paragraphs 3.204-3.208 of the	General support for the SPD and Masterplan is noted and welcomed. Assumed that "Hesketh Lane" refers to "Hesketh Land" – i.e. the substantial parcel of land between the West Coast Main Line and A562 Higher Road. We note the concerns raised about noise and vibration constraints, including those associated with the operations at Jaguar Land Rover. We can update masterplan commentary on potential noise sources in this location to include the JLR plant as well as the road and railway. With respect to the mix of uses on the parcel, the site is allocated for residential use within the Local Plan, and therefore there is no policy basis for restricting this use within the Local Plan. The SPD / masterplan does propose potential alternative uses, including small scale retail and/or pub/hotel use (we acknowledge the need for consistency between the SPD and masterplan here) – these are considered appropriate for integration with a residential-led scheme such as East of Halewood, maximising the benefits of road side frontage and providing	Consistency between mix of uses within SPD and Masterplan added. Specific reference to impact of JLR operations (as well as WCML) added at 4.12 and 4.16.	Masterplan framework updated to reflect noise / vibration from JLR. Parcel constraints and plan also updated to reflect that the further noise assessments needed before developable area can be confirmed, and this is dependent on eventual uses.

Local Business	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	Masterplan Baseline Report outline an absence of a noise and vibration assessment for 'Hesketh Lane' and it is therefore assumed by the author that the noise constraints can be mirrored for those identified for the land to the north of the A562. In addition, although the key findings of the surveys are identified, the technical studies are not available to view. The noise levels are expected to be substantially greater than those recorded and therefore cannot be assumed to be the same. This raises concern as we are unaware of the extent to which the noise from operations undertaken at Jaguar Land Rover Halewood have been accounted for in these surveys. It is crucial that a detailed and robust, noise survey is undertaken for 'Hesketh Lane' before considering allocations for this land parcel. Paragraph 4.16 of the draft SPD acknowledges the southernmost part of 'Hesketh Lane' is heavily constrained given the significant noise impacts from the main road and the railway. In addition, paragraph 3.208 of the Masterplan Baseline Report identifies noise mitigation within this	facilities needed in Halewood. These also have the advantage of being less sensitive to noise than private dwellings (particularly within garden spaces). No clear evidence has been provided that noise and vibration constraints are such that the parcel could not accommodate these uses with appropriate mitigation provided. We don't agree that B class uses would be a suitable use in this location, particularly given the proximity of residential dwellings (both at Aldersgate Drive and new homes planned across Higher Road at the former RSPCA site). The draft Masterplan acknowledges (in Table 3.1) that assumptions have been made about the proportion of the Hesketh estate site that is developable, due to noise and vibration constraints – it is acknowledged that this is a baseline position until further, more detailed assessments are carried out at the planning application stage, which can directly address the mitigation needed for the detailed scheme proposed for the site. Consistent with the response given to the landowner of this site, the Council has updated the Masterplan to show that the extent of the developable area		

Local Business	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	land parcel is likely to be required. Therefore, Paragraph 6.77 within the draft Masterplan outlines the provision of a landscape buffer within 'Hesketh Lane', comprising of open space along the southern boundary to act as a noise buffer to the railway corridor. The Opportunities and constraints map, figure 2.1, within the draft SPD proposes a 50m off set area adjacent to the West Coast Mainline based on the noise assessments undertaken. If Jaguar Land Rover's current business operations, in addition to anticipating future noise levels, have not been accounted for it is likely that the baseline noise levels for 'Hesketh Lane' are to be higher than those currently recorded. Jaguar Land Rover firmly support the inclusion of a landscape buffer and offset area within the masterplan adjacent to the West Coast Mainline as this would minimise both visual and noise disturbance, for future residents of the SUE, from the trainline in addition to Jaguar Land Rover's operations. However, given the absence of a noise assessment on 'Hesketh Lane', a greater buffer distance would be required. The	could change and will need to be informed by detailed technical assessments to accompany planning applications, when the mix and layout of proposed uses is known. This will then ensure a suitable buffer and/or other form of mitigation is included in the final scheme.		

Local Business	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	buffer zone must sufficiently address the noise and visual disturbance caused from both the West Coast Mainline and Jaguar Land Rover's current and future operations. Jaguar Land Rover Halewood utilise the West Coast Mainline for the delivery of materials to the plant. They have two rail access slots per weekday whereby the trains and associated freight is transferred off the mainline and into the site. This current operation which occurs twice daily, is a time-consuming, noisy process, taking up to eight hours per train. The duration of this process is reflective of the track layouts which are not fit for purpose and is therefore a constraint on both current and future use of railfreight for Jaguar Land Rover's operations. Given the high frequency of this operation, of which some of the time will be at unsociable hours, the noise generated will be heard within close proximity to Jaguar Land Rover Halewood, including 'Hesketh Lane'. The Eastlands Car Park at Jaguar Land Rover Halewood is located immediately to the south of the West Coast Mainline, approximately 250m			

Local Business	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	from 'Hesketh Lane'. This carpark has over 1,500 spaces and is frequently used by visitors and contractors in addition to an overflow car park for the storage of products. The carpark is utilised throughout the day, with peak usage between the hours of Sam-6am and 2pm-3pm, reflective of the shift work. The usage of this carpark therefore contributes to background noise in the area and will be heard from 'Hesketh Lane'. Paragraph 4.16 of the draft SPD indicates mixed use development on 'Hesketh Lane' may comprise use classes Cl (hotel) A3 (restaurants and cafes), and / or A4 (drinking establishments). However, Table 5.1 'Land Use and Amount' within the draft Masterplan states the land could instead accommodate up to 62 residential dwellings. This clearly introduces an additional, and more sensitive land use. As the use of 'Hesketh Lane' for uses classes Cl, A3 and A4 would be in conflict with policy, the alternative land uses identified would be residential development. However, in accordance with paragraph 4.16 of the draft SPD and the noise constraints			

Local Business	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	outlined above, residential development is not acceptable at this location. If there is a requirement for development on 'Hesketh Lane', office and industrial development (use classes Bl, B2 and B8) would be more suitable as it would be less constrained by the surrounding land uses. We therefore strongly object to any development on 'Hesketh Lane' excluding industrial development, given the policy and environmental restrictions for this land parcel. Jaguar Land Rover has future plans in place, within the lifespan of the SUE, including improvements to the existing rail freight operations to improve business operations and efficiency of the delivery and unloading of rail freight to Jaguar Land Rover Halewood via the West Coast Mainline. This would comprise a large development project for the plant, over a five to ten year period. In addition, an application is currently being prepared for the retention and diversification of the existing of the Eastlands carpark for its continued use in addition to the usage for seasonal demand products and product launches. On this basis, it is crucial that the Masterplan and SPD takes into consideration the future			

Local Business	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	expansion plans at Jaguar Land Rover Halewood which considering the allocation of land uses, particularly for 'Hesketh Lane'.			
Indigo Planning (Jaguar Landrover)	Jaguar Land Rover would like to stay involved with the work of the Council and in the preparation of the draft SPD and Masterplan. We look forward to hearing from you in due course and request that we are kept informed for any further consultation on the draft SPD and Masterplan.	Noted.	No	No
WYG (Everton FC)	Firstly there is an intention to implement the Lower Road planning permission having adequately (as agreed by the Council) discharged the relevant conditions that have kept the planning permission reference 15/00381/FUL capable of being developed out. The Club is considering the programme for its implementation together with the construction of the community hub building which is also part of the consent. There is no precise timescale but it is likely to be concluded within the next eighteen months to two years.	Noted.	No	No
WYG (Everton FC)	The Club would also wish to make some comments about the emerging scheme for the expansion of Halewood having attended the exhibition about the development and the intentions for	This is noted. The provision of pitches at Lower Road as part of EFC's proposals will not be accounted for in assessments of publically available pitches in Halewood.	No	Masterplan references to Everton ensure that pitches in Lower Road / Finch Lane are not for general public use.

Local Business	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	it. Firstly, with particular regard with the query raised by your department, it would not be appropriate in the Club's view to regard the provision for pitches for the Club's community programme on the Lower Road site as in some way reducing the requirement for formal public open space that would normally arise on a major housing development. As you are aware, the Club is seeking to enhance its community programme with Finch Farm being one of its major hubs for that programme. However, it is the case the pitches that will be used on the Lower Road site will be for the Club's community programme. It will not be possible for residents of the potential housing site to use them at their convenience on an ad hoc basis. Thus the Council should not be seeking to relax the normal requirements for public open space/playing field provision on major housing sites to take account of the fact that there may be some pitches available through the community programme at Everton on the Lower Road site.			
WYG (Everton FC)	The Club also would like to emphasise that it has concerns about any impact the development would have on the privacy of the Finch Farm training ground and would see no reason why the Club	Noted. References to any Finch Lane improvement scheme will need to reference maintenance of EFC's access to Finch Farm.	No	References to Finch Lane improvement scheme reflect EFC's access requirements.

Local Business	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	should become involved in any discussions about improving Finch Lane apart from ensuring that any access arrangements into the training ground remained in place. It will be decided in due course whether the scale and nature of the housing development would bring about the need to improve Finch Lane. The Club does not have a particular view on that so long as it does not affect its access arrangements nor has an impact on the significant landscaping either side of Finch Lane that helps protect the privacy of the Club's training ground. The Club would oppose any proposals to remove the landscaping on the western side of Finch Lane as part of the housing development	With respect to landscaping to the west of Finch Lane, there is no vehicular access from the East of Halewood site on to this route, meaning that much of the existing vegetation, including hedges and trees, is expected to be retained here.		
Yew Tree Farm	I am concerned as the ditches which take all the surface water from the site pass through my property only yards from my house. I realise the developers are proposing SUDs to regulate the flow but I imagine they have based any calculations of flow rates etc. on well managed watercourses. Unfortunately this is not the case, the watercourse running parallel to the railway has never been maintained to my knowledge while I have lived here	The watercourse referenced here is outside of the area designated as East of Halewood, and therefore outside of the spatial scope of the masterplan and the SPD for the site. However, the concerns raised here have been noted, can be discussed with the Council's LLFA and also with Network Rail.	No	No

Local Business	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	(1982).Network rail have never cleaned the watercourse out but have allowed trees to grow along its banks causing blockages and silting up and this has caused the outfalls from my ditches to be less than 50% effective. My property has already been flooded and I have real concerns that this development would make the problem worse unless the developers, myself and Network rail can come up with an effective solution to this. I have been collecting photographic and video evidence over the past years to prove my concerns are worthy of investigation and hope someone from the council and the developers will take the time to look at this problem.			
Yew Tree Farm	As my business has a large number of vehicles coming in and out of my property I am also concerned about traffic management. Why are there 2 proposed access routes onto Lower road (one either side of my entrance), none onto Finch Lane and one to Higher Road. Most of the traffic on/off the development will surely be heading for the major routes, ie Higher Road which leads directly to A5300, the bridge or Liverpool.	The proposed access arrangements have been promoted relative to the scale of the development site, to create a permeable configuration that will help to disperse vehicle movements, accommodate a bus route and integrate with the existing Halewood community to encourage sustainable movements. It is of note that multiple access points are proposed onto Baileys Lane (similar to Lower Road). Finch Lane is not considered suitable for the creation of new access points due to its restrictive geometry/width, the partial absence of footways and constraints such as utility	No	No

Local Business	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		apparatus that would render access and/or improvements to the route unviable. Detailed Transport Assessments, Road Safety Audits and Travel Plans will be used to analyse the highways network and justify the securing of appropriate mitigation measures as and where appropriate.		
Yew Tree Farm	Finally the map showing the 132k Electricity wire across my property is wrong.	Noted. This will be corrected in the final Masterplan, and its baseline documents will be updated.	No	Updated alignment of 132kv cable included in final masterplan.

Table 5.3: Statutory Consultees – detailed comments and Council response

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
Environment Agency	**Masterplan** *Page 17.* The site extent is located within a Source Protection Zone (SPZ) 1,2 & 3, for a potable public water supply (SJ45748645) and as such should be considered to be within an environmentally sensitive location. This should be noted within *Table 3.1, Summary of issues and constraints* because the presence of a source protection zone reduces drainage options, for example infiltration methods of drainage are not viable in SPZ1. Furthermore any drainage schemes (surface and foul water) will need to be of a higher design quality than standard. This will/may impact other chapters of the Masterplan (such as utilities and services, landuse and the implementation of SUDs). Our approach to groundwater is set out in; 'The Environment Agency's approach to groundwater protection'	Noted – the relevant sections of the Masterplan will be updated to reflect this.	No	Updated Table 3.1 and other sections to reflect Source Protection Zone constraint
Environment Agency	**Masterplan** *Page 21, Flood risk & drainage, point 3 & page 22 – Landscape, point 4*: both suggest the potential to use the proposed flood storage area to create an improved landscape and an enhanced area for ecological habitat. While the general intent is to be welcomed from a wider EA perspective, the impact on flood risk could be detrimental unless considered carefully. The storage area provides both an available volume for excess water to accumulate but will also act as an area of additional conveyance across which excess water will flow beyond the channel of Ditton Brook. For example, by increasing the 'roughness' of the	We acknowledge that the Masterplan needs to provide further clarification as to the role and function of the NIA / FSA, particularly in terms of its POS function, and ecological mitigation opportunities. We welcome EA's involvement in finalising proposals.	No	The Masterplan provides further clarification as to the role and function of the NIA / FSA.

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	floodplain by planting trees, bushes, shrubs, etc, may reduce the effectiveness of the area to convey flood water and any landscaping increasing ground level is likely to reduce the amount of floodplain storage available. Therefore, careful consideration of the type and scale of ecological enhancement within the flood storage area is strongly recommended and should be undertaken in close consultation with the Local Planning Authority and Environment Agency.			
Environment Agency	**Masterplan** *Page 24 & 25 Summary of land ownership* correctly identifies the Environment Agency as landowner of a parcel of land at SJ4566686473. For any proposal on or adjacent this plot land our Estates team should be contacted at in the first instance at; EstatesEnq@environment-agency.gov.uk	Noted.	No	No
Environment Agency	**Masterplan** *Page 59, Table 5.4 Contribution to mitigation and infrastructure provision, Flood Storage Area* discusses the possible use of land currently owned by United Utilities that is considered underutilised. For information the area is already considered to be part of the floodplain (Flood Zone 3 on the Agency's Flood Map for Planning).	Noted.	No	No
Environment Agency	**Masterplan** *Page 152 6.80 Public Art & installations* suggests the possible use of the flood storage area to include sculptures and art installations. The primary use of the area to convey and store water should remain unaffected by any additional uses proposed.	Noted – as per above, we acknowledge the need to clarify the role of the FSA in terms of public access.	No	The Masterplan provides further clarification as to the role and function of the NIA / FSA.

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
Environment Agency	**Masterplan** *Page 157, Wayfinding strategy plan* shows walking trails in close proximity to Ditton Brook (and possibly other drainage ditches). Walking trails should be kept at a sufficient distance from the top of any watercourse or ecological features so not to increase the potential for disturbance to existing and newly created wildlife habitats. In terms of Ditton Brook this should be a minimum of 8metres from the top of bank.	Noted – in finalising the approach in the masterplan to this area, we can incorporate the noted guidance.	No	The final Masterplan content reflects need to keep public access / walking trails an appropriate distance from the watercourse and ecological features. 8m constraint setback also be within Constraints Plan & Summary table
Environment Agency	**Masterplan** *Page 207 Planning application submissions*, for development located within a Source Protection Zone 1 and 2, a Hydrogeological Risk Assessment may be required to support any planning application and should therefore be added to Planning Application submissions.	Noted – this can be incorporated in the final masterplan.	No	Incorporated additional requirement for planning application submissions.
Environment Agency	**Masterplan baseline report** *Page 33, para 3.51,* makes reference to maintenance access provision to Ditton Brook. Developers should be made aware that under the Environmental Permitting (England and Wales) Regulations 2016, a permit may be required from the Environment Agency for any proposed works or structures, in, under, over or	Noted - the relevant sections of the final masterplan will be updated to reflect this.	No	Final documentation makes developers aware of this potential permit requirement.

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	within eight metres of the top of the bank of the brook. This was formerly called a Flood Defence Consent. Some activities are also now excluded or exempt. A permit is separate to and in addition to any planning permission granted. Further details and guidance are available on the GOV.UK website: https://www.gov.uk/guidance/flood-risk-activities-environmental-permits.			
Environment Agency	**Masterplan baseline report** *Page 35*, states the northern extent of the site is located within SPZ 2 and 3, however please be aware a small section is also located in SPZ1. The Baseline is correct the discharge of foul or surface water may not be permitted within source protection zone 2 and 3, however the final discharge will need to be mains within SPZ 1.	Noted – the utilities / drainage masterplan content with respect to drainage will be updated with this information.	No	Updated Table 3.1 and other sections to reflect Source Protection Zone constraint
Environment Agency	**Masterplan baseline report** *Page 97.* The site extent is located within a SPZ 1,2 & 3, for a potable public water supply (SJ45748645) and as such should be considered to be within an environmentally sensitive location. This should be noted within *Table 6.1, Summary of issues and constraints* because the presence of a source protection zone reduces drainage options, for example infiltration methods of drainage are not viable in SPZ1. Furthermore any drainage schemes (surface and foul water) will need to be of a high design quality. This will/may impact other chapters of the	Noted – the utilities / drainage masterplan content with respect to drainage will be updated with this information. For information, we recognise that infiltration is unlikely to be suitable within this site, due to ground conditions and a predominance of clay sub soil. References to permeable surfaces will be revised and replaced in the final masterplan. We are committed to ensuring a high design quality across all infrastructure – we would welcome the further involvement	No	Updated Table 3.1 and other sections to reflect Source Protection Zone constraint

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	Masterplan (such as utilities and services, land use and the implementation of SUDs). Our approach to groundwater is set out in; 'The Environment Agency's approach to groundwater protection'	of EA and UU in the detailed planning of drainage schemes for the site and in the planning application process.		
Halewood Town Council	**Geo-environment** – Members' personal historic knowledge is that, within the site, there are disused (coal) mine shafts which do not seem to be referenced anywhere within the consultation documents. Naturally, the existence of such is a major factor and must be thoroughly investigated and addressed as part of the final Master Plan.	Evidence collected to date has not revealed the existing of coal mining works within the site, nor have the Coal Authority advised of such a risk. Nonetheless this issue will be further investigated as detailed site investigations are undertaken at the planning application stage.	No	No
Halewood Town Council	**Heritage and Archaeology** – The Grade 2 listed resting place of 'Blackie the Warhorse' must be maintained as a focal point and destination in any development, and it would greatly benefit from a memorial Referencing interred remains, it is also relevant to mention the existence of the graves of animals within the RSPCA site. What is planned for these?	This is noted, and already reflected in the SPD and Masterplan. The Council's understanding is the only grave on the site is that of Blackie. The RSPCA site did include further memorials, but we understand that these are not related to burials situated on the site (and indeed were moved from a previous RSPCA site in Liverpool). The majority of these memorials have now been removed from the site by the RSPCA. It is worthwhile noting that these memorials are not listed or otherwise protected.	No	No
Halewood Town Council	**Transport** – The proposed development will bring undoubted strain on the transport provision in Halewood. The opportunity should therefore be taken to undertake major research to address the overall transport requirements of the township. Specifically, public transport, in which regard, the	Detailed Transport Assessments and Travel Plans will be used to analyse the transport network and justify the securing of appropriate mitigation measures as and where appropriate.	No	No

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	Master Plan acknowledges that in respect of rail transport, 'the frequency of services to and from Liverpool and Manchester to the station (Halewood) is low'. A great deal of work was undertaken in 2016 (?) on a proposal to develop a station (Halewood South) on land which forms part of the SUE site. Feasibility work was completed, supported by KMBC and Halewood Town Council, only for it to be dropped by Merseytravel. The proposed SUE gives new impetus to this proposal.	Merseytravel have been consulted on the proposals in their role as Integrated Transport Authority. They have advised of the need for a bus route to run through the site, which is reflected in the draft masterplan. A preliminary feasibility report into a potential Halewood South rail station was commissioned by Merseytravel. Whilst it did not discount such a facility, it identified significant challenges to viability and delivery. We do not consider that the proposals for the East of Halewood site now being developed change this situation. Thus such a new rail station does not form part of the proposals.		
Halewood Town Council	In relation to bus services, direct links to / from the SUE to the main 'bus terminal' at Halewood Shopping Centre in Leathers Lane are a must and once again, the services that will be developed to serve the SUE require to be integrated into an improved provision with particular reference to services serving hospitals.	The proposals include for the promotion of enhanced public transport facilities that would benefit new and existing communities. As noted above, following consultation with Merseytravel, the masterplan makes provision for a bus route to penetrate the East of Halewood site. The service within this route will be the subject of future detailed discussions in terms of precise proposals.	No	No
Halewood Town Council	The proposal that the access roads into the SUE are 'inward facing' rather than facing away from the town is welcomed as are the proposed upgrading to junctions.	Noted.	No	No

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
Halewood Town Council	The opportunity must be taken to eradicate the dangerous bend in Baileys Lane.	Detailed Transport Assessments, Travel Plans and Road Safety Audits will be used to analyse the highways network and justify the securing of appropriate mitigation measures as and where appropriate. Early discussions have identified this stretch of Baileys Lane as being of particular concern due to its constrained geometry; a new signalised junction is proposed to slow traffic down in this location. Developer proposals for this parcel to date show this route being realigned.	No	Further details about highway improvements needed are included in the final Masterplan.
Halewood Town Council	**Ecology** – The Town Council very much welcomes the proposal to retain and enhance Finch Woods and suggests consideration be given by KMBC to using part of this area as a Memorial Ground for cremated remains. Any boundary hedging to the SUE site must be such that it does not impede the vision of motorists and other road users.	Noted. With respect to hedgerows, this is agreed, and will be accounting for in detailed junction and carriageway design proposals.	No	No
Halewood Town Council	**Education** - It is noted from table 7.3. KMBC has identified a pupil generation rate of 0.3 pupils per new home, which by extrapolation, based on 1,100 homes this equates to 330 potential pupils, slightly more than a 1.5 form entry primary school. The Master Plan acknowledges that space in existing primary schools is limited but goes on to say that capacity will be provided by extensions to existing schools. Accepting that 330 pupils will not 'appear overnight', recognising that significant funding will	This is agreed. The final detail of the contributions sought towards education will be included in the Masterplan. The Local Education Authority has advised that the contributions needed are towards primary education and early years education.	No	Clarification on educational needs has been provided in the final Masterplan.

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	need to be identified not only within KMBC but via the Voluntary Aided and Academy Sector, work needs to start as soon as possible on a detailed plan of how this and early years provision is to be accommodated. It is also relevant to reference the recent announcement that Halewood Academy has no spare places in Year 7 in September 2019. If this trend continues and it does potentially impact on the SUE, two issues arise; • how is this capacity to be accommodated • the decision by the Academy Trustees to cease 6th form provision on the site, should be revisited.			
Halewood Town Council	**Health** – As with education, the SUE will bring additional pressure on health provision in the town ship with many residents already unable to access services within the area. Early discussions must take place with the appropriate NHS body about how this demand is to be satisfied.	The Council has already begun liaising with the Knowsley Clinical Commissioning Group on this matter. Details of their asks in terms of healthcare facilities are included within the final masterplan.	No	Clarification on healthcare needs has been provided in the final Masterplan.
Halewood Town Council	**Public Open Space** – Table 3.1. references 'Halewood Community Area', it is unsure exactly where this is! Reference has already been made to the retention of Finch Woods but adequate general amenity space should be provided within the development to KMBC standards.	Halewood Community Area refers to the geography used for planning outdoor sports provision, which is the whole Halewood settlement. This can be clarified in the final masterplan. The point on amenity space is agreed; this is already reflected in the masterplan.	No	Community Area term clarified within final masterplan document - - refers to Halewood as a whole settlement.
Halewood	Turning to the overall issue of **Residential**	This concern is noted, however this	No	No

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
Town Council	**Development** - references in paragraphs 5.17 – 5.18 and 5.20 - 5.23 of the draft Master Plan are welcome. However, in relation to para 5.19, it is of concern that this provides a 'loophole' to developers should this requirement render the development unviable.	section reflects the existing policy position in the Knowsley Local Plan Core Strategy (policy CS15 and CS27) and therefore can't be changed through the Masterplan or SPD.		
Halewood Town Council	In relation to 'tenure' unless it is linked to some form of 'shared ownership' the properties sold a 'freehold' be truly that and not be subject to any leasehold attracting ground rent.	Since the Council is not selling land for housing within this development, the Council has no landowner control over whether homes are sold as freehold or leasehold. However it is our understanding that all three volume house builders involved in East of Halewood intend to sell their market homes as freehold.	No	No
Highways England	In line with the Knowsley Council Local Plan, the Consultation Draft SPD sets out that the site is allocated to deliver approximately 1,100 dwellings. An addition in the Consultation Draft is that there is now a potential for the site to deliver up to 1,500 dwellings. The Masterplan sets out an approximate development amount for the site to deliver between approximately 1,250 – 1,500 dwellings. It is recommended that the East of Halewood SPD and Masterplan set out the same information regarding the proposed quantum of development likely to be delivered by the site.	The number of homes to be delivered within East of Halewood is stated as at least 1,100 and up to 1,500 in the draft SPD. The masterplan refines this further, giving a range of between 1,250 and 1,500 new homes, based on our understanding of the developable area, and an appropriate density range. While this appears confusing, it is appropriate that the Masterplan, as one way of developing the site, refines this further – where the SPD just sets general parameters.	No	No
Highways England	No mitigation at the SRN is stated as being required to mitigate the impact of the proposed quantum of development. We are aware of the significant growth proposals	Noted.	No	No

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	within the adjacent Boroughs of St Helens and Warrington which are likely to increase pressure on the existing Strategic Road Network. The site has the potential to give rise to highway traffic impacts on a cumulative level at the SRN. The location of M62 Junction 6 / M57 Junction 1 as a means for accessing the immediate SRN and wider motorway network and the location of three significantly sized Sustainable Urban Extensions in the Borough have the potential to give rise to highway traffic impacts on a cumulative level at the junction and the surrounding SRN.			
Highways England	We are keen to understand whether the microsimulation model commissioned by the Council that is currently being developed at M62 Junction 6 / M57 Junction 1 will incorporate the proposed development at the East of Halewood Sustainable Urban Extension.	Noted; further clarification on the technical details of the modelling work commissioned by the Council can be provided on request.	No	No
Historic England	**General:** The area covered by your SPD/masterplan includes the designated Grade II heritage asset – the grave of Blackie the war horse and therefore it is expected that any proposals put forward should be to ensure that this asset is appropriately sustained and enhanced in line with the requirements of the NPPF and the 1990 Act. We welcome the overall intention to ensure that this heritage asset is appropriately managed as part of the masterplanning of the site through the provision of some open space and interpretation of the grave within the wider site.	Noted and welcomed.	No	No

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
Historic England	**Supplementary Planning Document** As drafted, the SPD itself does not deal with the heritage asset within the site. Given SPD's are an expansion of adopted local plan policies (e.g. Policy CS20 – Managing the Borough's Historic Environment), this should be included. There does not appear to be any mention of it apart from in Section 2.17, where is it is identified as a key characteristic of the site. In view of this and the requirements of the NPPF and the 1990 Act, we would expect the SPD to detail how it has dealt with it, setting out the high level specification for the masterplan that is required for the site and the key guidance that development proposals will need to adhere to (note this is taken from page 34 of the masterplan document). The SPD should clearly outline how the site has considered the significance of this heritage asset including its setting and how this has contributed to the layout of the site and how it has been part of the masterplan exercise.	We acknowledge that further content relating to this heritage asset is needed within the SPD. Additional content can be included in: - Analysis of constraints and opportunities - EH5 – Public Open Space - EH8 – Design Principles - EH10 – Landscape and Ecology And supporting text of the above sections	Content of SPD updated to reflect importance of this heritage asset.	No
Historic England	**Supplementary Planning Document** Figure 2.1: The Grade II heritage asset, the grave of Blackie the war horse does not appear to have been marked on the map.	Figure 2.1 within the SPD to be updated to address this omission.	Updated Figure 2.1 to include location of heritage asset.	No
Historic England	**Supplementary Planning Document** Para 3.16: Reference within the box to EH2: East of Halewood Masterplan makes reference within section 3 to a technical report which will cover a number of topics including archaeology and heritage (point d.) which is welcomed. But this does not appear to accompany this consultation. So we are unable to comment on this.	A summary of this report has been published within the Baseline Report accompanying the draft masterplan, available on the Council's website.	No	No

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
Historic England	**Masterplan** We welcome recognition in the masterplan's key opportunities to celebrate the grave of Blackie the Warhorse (table 3.2) and broadly support the document's intentions to recognise it in the masterplanning of the site. The masterplan (page 63) promotes connectivity routes to various sites including the grave of Blackie the Warhorse, which is welcomed, in particular the intention to celebrate and tell the story of Blackie the Warhorse (Para 6.80).	Noted and welcomed.	No	No
Historic England	**Masterplan** It is worth clarifying that the grave is a Grade II heritage asset and not locally listed and therefore is not considered a local heritage asset as mentioned. Also reference again is made (see above) to the fact that the SPD does not deal with this. The masterplan should logically lead on from the SPD which sets out the framework from what is required in the designing of the site.	The final masterplan will ensure that references to Blackie's grave are related to its status as a Grade II asset rather than a local heritage asset. Points about the SPD content are noted above and have been addressed.	See above.	Ensure masterplan refers appropriately to Blackie's listed status.
Historic England	**Masterplan** In view of recognising the opportunity of the historic environment, we would expect that this to be included within the SWOT summary on page 26.	Agreed – the opportunities around Blackie should be added to the Masterplan SWOT summary.	No	Updated SWOT summary with additional opportunity
Historic England	**Masterplan** Table 5.4 includes the mitigation measures – but there is no evidence which provides the background to this mitigation. In order to understand the setting of the asset there needs to have been an analysis of the impact the development of the site will have on it and what contribution it currently makes to its setting. Whilst a setback may be appropriate this needs to detail,	Agreed – additional content to be added to the Masterplan to explain the rational for the treatment of the area near to the Listed asset, with input from the Council's conservation officer.	No	Refer to the grave as 'asset' in reports Final Masterplan includes further detail and

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	how, where and why rather than 'accordingly'. In addition, would it be better in this instance to refer to heritage asset rather than "building" when referring to the grave. Also, the setting should not be respected and enhanced, rather sustained and enhanced, as the intention of any development will be to sustain and not harm and also provide opportunities for enhancement in line with the NPPF.			explanation for the proposed treatment of the area adjacent to the listed asset.
Historic England	**Masterplan** Reference is made to the design and local distinctiveness guide (page 59) – where is this – should this be referring to the design guidance section (06)?	Yes – correction to be actioned in the final version of the masterplan.	No	Final masterplan refers to design guidance, chapter 6.
Historic England	**Masterplan** For consistency, where reference is made to the war grave that the same terminology is used as for example listed structure, building etc. is used.	Noted – this will be addressed in the final masterplan.	No	Final masterplan ensures consistent terminology. Refer to the grave as 'asset' in reports
Historic England	**Masterplan** Para 6.84 outlines the guidance for the masterplan in terms of the historic environment. This should flow from the content of the SPD and should be included within the document (see comments above). In terms of this guidance, we welcome the creation of a space which is intended to have a purpose and be usable by people. Again there needs to be evidenced, to inform how this guidance has been decided upon which should	Points about the SPD are noted and responded to above. We consider that the approach taken in the draft masterplan does seek to deliver a purposeful open space, which strikes a balance between sustaining / enhancing the setting of the listed structure, alongside providing a space people can	See above	Final Masterplan includes further detail and explanation for the proposed treatment of the area adjacent to the listed asset.

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	include an assessment of the significance of the heritage asset and whether there is any harm and why certain mitigation measures have been put forward. This should assist in understanding these guiding principles.	use, both informally and for formal ceremonies. However, agreed that additional content to be added to the Masterplan to explain the rational for the treatment of the area near to the Listed asset, with input from the Council's conservation officer.		
Historic England	**Masterplan** The masterplan proposes a substantial piece of public art celebrating the warhorse. Historic England welcomes the intention to promote the understanding and celebration of this unusual heritage asset but such a proposal would need to undergo an assessment separate to that required for the masterplanning on the site to determine the impact this proposal will have on the significance of this heritage asset including its setting to determine its appropriateness and provide information on level of harm. In other words further evidence is required to support is inclusion.	The proposed public art feature is not to be located in immediate proximity to the listed structure, which was not considered appropriate. This can be clarified in the final masterplan.	No	Clarity added to the final masterplan properly communicate that the art installation is not intended to be included in proximity to the Grave Stone
Historic England	**General:** Historic England strongly advises that you engage with conservation, archaeology and urban design colleagues at the local authority to ensure that all the relevant features of the historic environment and that the historic environment is effectively and efficiently considered as part of the SPD and masterplan. They are also best placed to advise on historic environment issues and in view of this we don't consider it to be necessary for us to be further involved in this proposal.	Noted.	No	No

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Natural England	Natural England welcomes the strong policies contained within the SPD and the wide commitment to sustainable development, place-making in line with the built and natural environment, consideration of sustainable transport and integrated use of green infrastructure. However, we are not satisfied that an adequate Habitats Regulations Assessment (HRA) has been undertaken. We acknowledge that the SPD was included within the Core Strategy HRA, however, in our opinion the HRA provided (dated January 2016) alongside this consultation is outdated and does not provide adequate information to assess the potential impacts. The policy numbering and wording included within the HRA screening do not match the policies outlined in the SPD document, and so there are inconsistencies between the two documents. We understand that the HRA is currently being finalised during the consultation period of this SPD, as stated in paragraph 1.19 of the SPD. Natural England would need to review the final version of the HRA in order to provide our formal statutory advice.	Noted – the update of the HRA has now been completed to accompany the final SPD its content shared with Natural England. Changes arising from the HRA recommendations have been included in the final SPD.	Final SPD will refer to updated HRA and include changes in relation to its recommendations.	No.
Natural England	**Supplementary Planning Document** We note that there is an incorrect reference to the Habitats Regulations under paragraph 1.16 which needs amending to read '*Conservation of Habitats and Species Regulations 2017 under Regulation 63'*.	Noted – this will be corrected.	Final SPD includes corrected reference to regulations.	No.
Natural	**Supplementary Planning Document** We	Noted and welcomed.	No	No

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
England	welcome the consideration of joined up pedestrian and cycling connections within the development and linkages to the surrounding area as included in policy EH6: Access and EH9: Streets, paths and movement. As well as the consideration of sustainable development and requirements for electric vehicle charging points and renewable energy provisions included within EH11: Development Sustainability.			
Natural England	**Supplementary Planning Document** **EH4: Residential Development** Where the policy sets out the number or maximum number of dwellings that the site will deliver, there should be a full assessment of any impacts arising in the accompanying HRA to ensure that there will be no impacts on the internationally designated sites. This will also ensure that consideration is made to the whole development and ensure that the full quantum of housing can come forward. Particularly this should include consideration of impacts on European designated sites from recreational disturbance, air pollution and waste water discharge.	Noted, this is addressed in the revised HRA.	No	NO
Natural England	**Supplementary Planning Document** **EH8: Design Principles** We welcome the key principles included in the SPD particularly those relevant to increasing pedestrian connectivity and Green Infrastructure (GI). The provision for GI within the development should be in line with the GI policy set out in your Local Plan (Policy CS8) which identifies the delivery of new integrated and functional GI	Noted and welcomed. It will be appropriate to add in reference to environmental resources and protection as a factor which design and layout needs to respond to. This covers national resources etc. as mentioned in the response. We consider the reference in EH8 to	Added in reference to environmental resources protection matters as something that design and layout proposals should respond to, within EH8 point 7	No

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	including sustainable drainage systems, carbon capture and storage, soft landscaping and green roofs. The National Planning Policy Framework states that local planning authorities should; '*take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure'*. The Planning Practice Guidance on Green Infrastructure provides more detail on this. Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities. You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans. Further information on GI is include within *The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "*Good Practice Guidance for Green Infrastructure and Biodiversity*".*	ecology will cover the matter relating to impact of lighting on biodiversity.		

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	The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 180).			
Natural England	**Supplementary Planning Document** **EH10: Landscape and Ecology** Natural England welcomes the consideration of retaining and enhancing naturally functioning features within the development of the area, such as hedgerows, trees and water bodies and the commitment to a sustainable drainage scheme to manage surface water. We are pleased to see consideration of the landscape and would welcome further inclusion of the health and well-being benefits that it provides to communities. We are encouraged that the requirement for bird surveys has been included within this policy, highlighting the Mersey Estuary Special Protection Area / Ramsar, but we suggest it would be helpful to specifically state that these surveys will be required to inform project level HRAs of individual developments coming forward. This SPD could consider setting out guidance to incorporate features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision	Noted and welcomed. We consider it appropriate to add in that bird surveys may inform project level HRAs, and also to reflect role of built structure in providing ecological and biodiversity mitigation.	Added in reference to project level HRA within EH10. Added in reference to the importance of built structure contributions to biodiversity and ecological mitigations	No

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit. We recommend that this guidance should be included within the SPD rather than deferred to the Masterplan.			
Natural England	**Supplementary Planning Document** **EH12: Planning Application Requirements** We would recommend that to ensure development of the whole site the accompanying HRA should consider key impacts set out in this letter below, to maximise on integrating any required mitigation and ensure that development of the whole site will be delivered.	Noted.	New HRA referenced in SPD introduction and relevant recommendations actioned.	No
Natural England	**Habitats Regulations Assessment** A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. **Changes since the production of the 2016 HRA** The SPD HRA needs to fully assess the potential impacts of the development on European designated sites. We acknowledge that the HRA is being revisited, but we would have expected to see	Noted – the update of the HRA has now been completed and shared with Natural England.	New HRA referenced in SPD introduction and relevant recommendations actioned.	No

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	a completed and updated version to accompany the SPD consultation, particularly due to the length of time passing since the original HRA was produced and the further investigations of the development area. The preferred options for development and number of residential dwellings have both been refined in terms of their potential area and capacity and therefore there is more detail which can be assessed in the HRA. We recommend that the updated HRA needs to correctly cross reference the SPD to allow for accurate assessment of the policies, as since the original HRA the SPD policy wording and referencing has been amended. Furthermore, since the Core Strategy HRA there have been a number of changes that need to be considered when updating the HRA. As you will be aware the NPPF has been updated and as such the revised HRA will need to ensure correct updated referencing where appropriate. We would also recommend that you familiarise yourselves with recent case law and where appropriate ensure that the HRA is compliant, particularly regarding; • The People over Wind and Sweetman vs Coillte Teoranta (ref: C 323/17) judgement which concludes that mitigation measures cannot be taken into account when deciding whether a plan or project is likely to have a significant effect on a European site. • The Wealden District Council v. Secretary of State for Communities and Local Government,			

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	Lewes District Council and South Downs National Park Authority [2017] EWHC 351 in terms of in-combination effects relating to air pollution.			
Natural England	**Recreational Disturbance** We would also welcome a revised assessment on the potential recreational disturbance arising from this development on European designated sites which includes the revised quantum of housing within the East of Halewood development. Since the original HRA in 2016 there has been ongoing work across the Liverpool City Region in relation to how recreational disturbance is considered. There is a consensus that there is potential of in-combination impacts of recreational disturbance resulting from the quantum of housing across the Liverpool City Region. Work is still ongoing on this issue across the Liverpool City Region, involving Local Planning Authorities, MEAS and Natural England, and we recommend that current thinking should be reflected within the HRA.	Noted – the update of the HRA has now been completed and shared with Natural England.	As above	No
Natural England	**Key impacts for consideration** In light of the above comments, and location of the East of Halewood site, we recommend that the updated HRA should be focused on potential impacts to the following: • Functionally linked land • Recreational disturbance • Water quality • Air quality	Noted – the update of the HRA has now been completed and shared with Natural England.	As above	No

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
Natural England	We advise that you re-consult Natural England on the updated version of the HRA and if in the meantime you have any queries please do not hesitate to contact me on the details below or telephone 02080 266127. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.	Noted – the update of the HRA has now been completed and shared with Natural England.	As above	No
Network Rail	Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of the Development Management Procedure Order) and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the Development Management Procedure Order. Key aspirations for the council that could impact upon the railway infrastructure include. • 1100 dwellings; • opening railway arch adjacent to Lower Road to create a pedestrian and cycle connection between the northern and southern master plan parcels; • Pedestrian and cycle connectivity between the northern and southern areas of the SUE (including the southernmost Hesketh land parcel), crossing underneath the existing railway viaduct and over Higher Road.	Noted.	No	No

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Network Rail	Opening the railway arch adjacent to Lower Road to create a pedestrian and cycle connection between the northern and southern master plan parcels may give rise to shared value (assuming no pre-existing public rights). The promotor should take early advise and engage with NR Property Development to consider this. Below is a link to the page on NR's external website which includes the shared value policy - see last document under the heading 'Brochures and Documents'. https://www.networkrail.co.uk/industry-commercial-partners/network-rail-property/network-rail-property/development/	Noted.	No	No
Network Rail	Network Rail has been in discussion with Knowsley Council regarding the proposal, including the use of the Western redundant arch adjacent to Lower Road. Network Rail has raised concerns that If the ground beneath the arch is removed, the active pressure of the ground behind the abutment may destabilise the structure. Network Rail has proposed a preferred option of using a partial section of the arch space and building a retaining wall to keep the conditions the same. The applicant will need to enter into a Licence agreement for the works and will be liable for all costs incurred by Network Rail.	Noted. These considerations will be noted within any future scheme drawn up by the Council for the railway arch.	No	No
Network Rail	The plan shows a SUDs attenuation pond adjacent to the existing railway line. The applicant is to	Noted. The final Masterplan SUDs section can outline the restrictions on SUDs	No	Sections 5 and 6 of the final

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	ensure that any attenuation ponds are located at least 30m from the existing operational railway boundary. New detention ponds or increased discharge to a detention pond adjacent to the railway would not be acceptable due to the risk of destabilising earthworks due to potential for softening of the railway boundary, and due to the increased risk of causing flooding to the railway. • Network Rail will not accept liability for water from the proposal area draining towards the railway. • Network Rail would require details of the excavation works of the pond as this represents a change in ground levels near to the existing operational railway. • The applicant will need to supply details of the construction methodology of the basin. • Details of who will maintain the basin once it has been installed. • Details of what mitigation methods are to be included within the pond construction to prevent water flowing down in the direction of the railway or seeping into the ground. Water must not drain in the direction of the operational railway boundary. General Drainage requirements: • All surface waters and foul waters must drain away from the direction of the railway boundary. • Soakaways for the proposal must be placed at	location in respect of railway infrastructure.		masterplan content with respect to SUDs reflects Network Rail advice, and the constraints section has also been updated in this regard.

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	least 30m from the railway boundary. • Any drainage proposals for less than 30m from the railway boundary must ensure that surface and foul waters are carried from site in closed sealed pipe systems. • Suitable drainage or other works must be provided and maintained by the developer to prevent surface water flows or run-off onto Network Rail's land and infrastructure. • Proper provision must be made to accept and continue drainage discharging from Network Rail's property. • Drainage works must not impact upon culverts, including culverts/brooks etc that drain under the railway. • The developer must ensure that there is no surface or sub-surface flow of water towards the operational railway. • Rainwater goods must not discharge in the direction of the railway or onto or over the railway boundary.			
Network Rail	When designing proposals, the developer and council are advised, that any measurements must be taken from the operational railway / Network Rail boundary and not from the railway tracks themselves. From the existing railway tracks to the Network Rail boundary, the land will include critical infrastructure (e.g. cables, signals, overhead lines, communication equipment etc) and boundary treatments (including support zones) which might be adversely impacted by outside party proposals unless the necessary asset protection measures are undertaken. No proposal should increase	Noted. This clarification about how distance from the railway should be measured can be reflected in the final masterplan.	No	Clarity about how distance from the railway should be measured is included in the final masterplan. Caveat provided by Network Rail added to

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	Network Rail's liability. To ensure the safe operation and integrity of the railway, Network Rail issues advice on planning applications and requests conditions to protect the railway and its boundary.			constraints summary table
Network Rail	The applicant will provide at their own expense (if not already in place): • A suitable trespass proof steel palisade fence of a minimum height of 1.8m adjacent to the boundary with the railway/railway land. • The fence must be wholly constructed and maintained within the applicant's land ownership footprint. • All foundations must be wholly constructed and maintained within the applicant's land ownership footprint without over-sailing or encroaching onto Network Rail's boundary. • The fence must be set back at least 1m from the railway boundary to ensure that Network Rail can maintain and renew its boundary treatments. • Existing Network Rail fencing, and boundary treatments, must not be damaged or removed in any way. • Network Rail will not allow any maintenance works for proposal fencing or proposal boundary treatments to take place on its land. • Proposal fencing must not be placed on the boundary with the railway. • Any fencing over 1.8m in height will require agreement from Network Rail with details of foundations and wind loading calculations submitted for review.	Noted. The final masterplan can include this guidance about boundary treatments to the railway.	No	The appropriate section of the final masterplan can reflect Network Rail's requirements for boundary treatments.

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	• The fence should be maintained by the developer and that no responsibility is passed to Network Rail.			
Network Rail	The developer/applicant must ensure that their proposal, both during construction and as a permanent arrangement, does not affect the safety, operation or integrity of the existing operational railway / Network Rail land. There must be no physical encroachment of the proposal onto Network Rail land, no over-sailing into Network Rail air-space and no encroachment of foundations onto Network Rail land and boundary treatments. Any construction works on site and any future maintenance works must be conducted solely within the applicant's land ownership. If vibro-compaction machinery / piling machinery or piling and ground treatment works are to be undertaken as part of the development, details of the use of such machinery and a method statement must be submitted to the Network Rail for agreement. • All works shall only be carried out in accordance with the method statement and the works will be reviewed by Network Rail. The Network Rail Asset Protection Engineer will need to review such works in order to determine the type of soil (e.g. sand, rock) that the works are being carried out upon and also to determine the level of vibration that will occur as a result of the piling. • The impact upon the railway is dependent	Noted. The advice here is welcomed as helpful clarification. The final masterplan can note in its delivery section the need for applicants to respond appropriately to restrictions on construction near to the railway.	No	Final masterplan delivery section includes a summary of Network Rail advice about construction near the railway.

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	upon the distance from the railway boundary of the piling equipment, the type of soil the development is being constructed upon and the level of vibration. Each proposal is therefore different and thence the need for Network Rail to review the piling details / method statement. Maximum allowable levels of vibration - CFA piling is preferred as this tends to give rise to less vibration. Excessive vibration caused by piling can damage railway structures and cause movement to the railway track as a result of the consolidation of track ballast. The developer must demonstrate that the vibration does not exceed a peak particle velocity of 5mm/s at any structure or with respect to the rail track. The NPPF states: *"178. Planning policies and decisions should ensure that:* *a. A site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability."* In order to comply with the NPPF, the applicant will agree all excavation and earthworks within 10m of the railway boundary with Network Rail. Network Rail will need to review and agree the works to determine if they impact upon the support zone of our land and infrastructure as well as determining relative levels in relation to the railway. Network Rail would need to agree the following:			

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	• Alterations to ground levels • De-watering works • Ground stabilisation works • Works to retaining walls • Construction and temporary works • Maintenance of retaining walls • Ground investigation works must not be undertaken unless agreed with Network Rail. • Confirmation of retaining wall works (either Network Rail and/or the applicant). • Alterations in loading within 15m of the railway boundary must be agreed with Network Rail. Network Rail would need to review and agree the methods of construction works on site to ensure that there is no impact upon critical railway infrastructure. No excavation works are to commence without agreement from Network Rail. The council are advised that the impact of outside party excavation and earthworks can be different depending on the geography and soil in the area. The council and developer are also advised that support zones for railway infrastructure may extend beyond the railway boundary and into the proposal area. Therefore, consultation with Network Rail is requested. Any right of support must be maintained by the developer. Network Rail requests that the developer ensures there is a minimum 3 metres gap between the buildings and structures on site and the railway boundary. Less than 3m from the railway boundary to the edge of structures could result in construction and future maintenance works being			

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	undertaken on Network Rail land, and close to the railway boundary potentially impacting support zones or lineside cabling. All the works undertaken to facilitate the design and layout of the proposal should be undertaken wholly within the applicant's land ownership footprint including all foundation works.			
Network Rail	The council and the developer (along with their chosen acoustic contractor) are recommended to engage in discussions to determine the most appropriate measures to mitigate noise and vibration from the existing operational railway to ensure that there will be no future issues for residents once they take up occupation of the dwellings. The NPPF states, "*182.Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use), in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed*." Network Rail is aware that residents of dwellings adjacent to or in close proximity to, or near to the existing operational railway have in the past discovered issues upon occupation of dwellings with noise and vibration. It is therefore a matter for the developer and the council via mitigation measures and conditions to ensure that any existing noise and vibration, and the potential for any future noise and vibration are mitigated	Noted. Network Rail's advice with respect to noise and vibration is welcomed as helpful clarification. The final masterplan can reflect this advice for noise assessments to be submitted with planning applications for land adjacent to the railway.	No	Final masterplan delivery section includes a summary of Network Rail advice about noise and vibration issues near to the railway.

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	appropriately prior to construction. To note are: • The current level of railway usage may be subject to change at any time without prior notification including increased frequency of trains, night time train running, heavy freight trains, trains run at weekends /bank holidays. • Maintenance works to trains could be undertaken at night and may mean leaving the trains' motors running which can lead to increased levels of noise and vibration. • Network Rail carry out works at night on the operational railway when normal rail traffic is suspended and these works can be noisy and cause vibration. • Network Rail may need to conduct emergency works on the existing operational railway line which may not be notified to residents in advance due to their safety critical nature, and may occur at any time of the day or night, during bank holidays and at weekends. • Works to the existing operational railway may include the presence of plant and machinery as well as vehicles and personnel for works. • The proposal should not prevent Network Rail from its statutory undertaking. Network Rail is a track authority. It may authorise the use of the track by train operating companies or independent railway operators, and may be compelled to give such authorisation. Its ability to respond to any enquiries regarding intended future use is therefore limited. • The scope and duration of any Noise and			

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	Vibration Assessments may only reflect the levels of railway usage at the time of the survey. • Any assessments required as part of CDM (Construction Design Management) or local planning authority planning applications validations process are between the developer and their appointed contractor. • Network Rail cannot advise third parties on specific noise and vibration mitigation measures. Such measures will need to be agreed between the developer, their approved acoustic contractor and the local planning authority. • Design and layout of proposals should take into consideration and mitigate against existing usage of the operational railway and any future increase in usage of the said existing operational railway. • Noise and Vibration Assessments should take into account any railway depots, freight depots, light maintenance depots in the area. If a Noise and Vibration Assessment does not take into account any depots in the area then the applicant will be requested to reconsider the findings of the report. • Railway land which is owned by Network Rail but which may be deemed to be 'disused ' or 'mothballed', may be brought back into use. Any proposals for residential development should include mitigation measures agreed between the developer, their acoustic contractor and the LPA to mitigate against future impacts of noise and vibration, based on			

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	the premise that the railway line may be brought back into use. • Works may be carried out to electrify railway lines and this could create noise and vibration for the time works are in progress. Electrification works can also result in loss of lineside vegetation to facilitate the erection of stanchions and equipment.			
Network Rail	Proposals for the site should take into account the recommendations of, 'BS 5837:2012 Trees in Relation to Design, Demolition and Construction', which needs to be applied to prevent long term damage to the health of trees on Network Rail land so that they do not become a risk to members of the public in the future. All vegetation on site should be in line with the recommended tree matrix for the reasons outlined in the document. *http://wcms-internet.corp.ukrail.net/community-relations/trees-and-plants/*	Noted. This clarification is welcomed. The final masterplan can reflect this advice for protection of trees on Network Rail land.	No	Final masterplan delivery section includes a summary of Network Rail advice about trees near to the railway.
Network Rail	Where a proposal calls for the following adjacent to the boundary with the operational railway, running parallel to the operational railway or where the existing operational railway is below the height of the proposal site: • hard standing areas • turning circles • roads, public highways to facilitate access and egress from developments Network Rail would very strongly recommend the installation of suitable high kerbs or crash barriers	Noted – as above, this advice can be reflected in the final masterplan.	No	Final masterplan delivery section includes a summary of Network Rail advice about construction of highway / access routes near the

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	(e.g. Armco Safety Barriers). This is to prevent vehicle incursion from the proposal area impacting upon the safe operation of the railway. Network Rail would draw the LPA and developer's attention to the Department of Transport's, 'Managing the accidental obstruction of the railway by road vehicles,' (2003) for reference. The developer is advised to provide a risk assessment (RVI) to determine what protection should be given to the railway and its boundary as a result of placing roads, parking spaces or turning circles adjacent to railway land. The Road Vehicle Incursion (RVI) Risk should be considered by the developer in conjunction with the LPA and the Highways team. A risk assessment will provide a clear framework for any mitigation measures necessary when constructing a proposal that includes vehicle parking or vehicle movements adjacent to the railway.			railway.
Network Rail	All asset protection measures to be carried out under a BAPA with Network Rail (if not already entered into).	Noted.	No	No.
Sport England	**Masterplan** P.19 Public Open Space: The following statement is welcomed: *"Against the Council's standards, there is a deficit of pitches in the area, which means the East of*	The SPD and Masterplan content on the requirement for pitch provision is informed by the Council's currently adopted policy. The concerns regarding the inclusion of new pitches within development are noted; the Masterplan proposes that rather than	No	No

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	Halewood development will need to make a contribution towards the provision of new/improved pitches." However, the current Knowsley Playing Pitch Strategy (PPS) 2018 should be used to determine the level of pitch provision required to meet the additional demand from the proposed housing. Sport England has developed a strategic planning tool call the New Development Pitch Calculator which quantifies the demand from the new development and converts that into a pitch requirement and indicative cost. Please refer to Recommendation (g) Secure Developer Contributions of the PPS for further information. Please contact the undersigned to discuss the access to and use of the Calculator. It should be noted that local standards are not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas or the variable units of demand for individual pitch/court types. For example, the unit of demand for a court/pitch ranges from two people if a tennis court to 30 people if a full sized adult rugby pitch. In addition the catchment area for sports range from Ward level if a junior football pitch to Borough wide if rugby or hockey. This means the accessibility standards cannot accurately reflect where the demand for outdoor sport is derived from. Quantitative standards are not appropriate because although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want	on site provision, the development makes appropriate contributions to the improvement and addition of new facilities at nearby Halewood Leisure Centre. This will consolidate the sporting offer at an existing hub facility, as supported by Sport England.		

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	to participate in sport. In reality the application of standards has led to single pitch sites being constructed within housing developments that are unsupported by ancillary facilities and are not located in areas of demand. These pitches do not contribute to the supply of pitches and all too often become informal kick about areas or semi natural open space. A guidance note on the inappropriate use of standards for outdoor sport has been attached for your information. Sport England does not object to the use of standards for other open space typologies, only outdoor sport.			
Sport England	P.37 Additional Context: The Greenspace Strategy 2015-2020 is listed but not Knowsley's Playing Pitch Strategy. Sport England would like to see this evidence base included within the Masterplan document as it will be an essential document in helping to inform the requirement for new/enhanced playing pitches to meet the additional demand for sport arising from this development.	Noted. This document can be listed within the Masterplan.	No	Playing Pitch Strategy added as evidence base document within the final masterplan.
Sport England	Table 5.3 p.57: The proposal to locate additional/enhanced outdoor sport within Halewood Leisure is welcomed. This is an existing sports facility that can be enhanced to make best use of complementary facilities and making the whole site a multi sport sustainable community facility. The Council's sports evidence base Playing Pitch Strategy (2018) and Built Facilities Strategy (if one has been prepared) would help inform the most appropriate mix and size of sports facilities to meet demand. In addition Sport England has two strategic planning tools to help estimate additional	Noted and welcomed.	No	No

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	demand and the type of indoor and outdoor sports required. The New Development Pitch Calculator and Sports Facility Calculator are the starting point and should be used in conjunction with an up to date PPS and Built Facilities Strategy. Please contact the undersigned for more information.			
Sport England	Chapter 6 Design Guidance: It appears that some of the general principles of Active Design have been used to help inform the overall infrastructure of the Masterplan. However, as the developments come forward and are in the more detailed design phase Sport England would like to see all of the principles of Active Design integrated. Sport England and Public Health England has prepared guidance called 'Active Design' which helps planners, developers and suchlike to incorporate key principles into new development which creates physical activity opportunities. The guidance can be found using this link: https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/	As noted, many of the principles of active design are already incorporated in the masterplan, particularly within its access and movement approach, and its approach to green infrastructure, public open space and outdoor sports provision. Particularly strong elements include: - Activity for all - Walkable communities - Connected walking and cycling routes - Network of multifunctional open space - High quality streets and spaces - Appropriate infrastructure - Management, maintenance, monitoring and evaluation These principles reflect adopted parts of the Council's existing policy framework, particularly the Local Plan Core Strategy. The existing content is considered appropriate for the masterplan; while the Sport England documentation is noted and clearly available for applicants to view, it is not considered that it should be reflected as a requirement of new development. Notwithstanding this, we can include the	See below.	No

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		Active Design document as an available guidance document – see below response on the SPD.		
Sport England	**Supplementary Planning Document** Table 4.1 para 4.7, and Table 4.2 paragraph 4.26: It should be noted that local standards are not appropriate for outdoor sports because they do not and cannot take into account sports catchment areas or the variable units of demand for individual pitch/court types. For example, the unit of demand for a court/pitch ranges from two people if a tennis court to 30 people if a full sized adult rugby pitch. In addition the catchment area for sports range from Ward level if a junior football pitch to Borough wide if rugby or hockey. This means the accessibility standards cannot accurately reflect where the demand for outdoor sport is derived from. Quantitative standards are not appropriate because although it is widely acknowledged housing growth generates additional demand for sport not everyone from that housing site will want to participate in sport. In reality the application of standards has led to single pitch sites being constructed within housing developments that are unsupported by ancillary facilities and are not located in areas of demand. These pitches do not contribute to the supply of pitches and all too often become informal kick about areas or semi natural open space. A guidance note on the inappropriate use of standards for outdoor sport has been attached for your information. Sport England does not object to the use of standards for other open space typologies, only outdoor sport.	The SPD and Masterplan content on the requirement for pitch provision is informed by the Council's currently adopted policy. The concerns regarding the inclusion of new pitches within development are noted; the Masterplan proposes that rather than on site provision, the development makes appropriate contributions to the improvement and addition of new facilities at nearby Halewood Leisure Centre. This will consolidate the sporting offer at an existing hub facility, as supported by Sport England.	No	No

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	The current Knowsley Playing Pitch Strategy (PPS) 2018 should be used to determine the level of pitch provision required to meet the additional demand from the proposed housing. Sport England has developed a strategic planning tool call the New Development Pitch Calculator which quantifies the demand from the new development and converts that into a pitch requirement and indicative cost. Please refer to Recommendation (g) Secure Developer Contributions of the PPS for further information. Please contact the undersigned to discuss the access to and use of the Calculator.			
Sport England	**Supplementary Planning Document** Paragraph 4.24: The requirement for outdoor sports provision is welcomed but the requirement should be informed by the use of Sport England's New Development Pitch Calculator and the 2018 PPS. Sport England would be happy to discuss access to and use of the Calculator to help inform this and other large scale developments.	The SPD and Masterplan content on the requirement for pitch provision is informed by the Council's currently adopted policy.	No	No
Sport England	**Supplementary Planning Document** Paragraph 4.29: The proposal to locate additional/enhanced outdoor sport within Halewood Leisure is welcomed. This is an existing sports facility that can be enhanced to make best use of complementary facilities and making the whole site a multi sport sustainable community facility. The Council's sports evidence base Playing Pitch Strategy (2018) and Built Facilities Strategy (if one has been prepared) would help inform the most appropriate mix and size of sports facilities to meet	Noted and welcomed.	No	No

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	demand. In addition Sport England has two strategic planning tools to help estimate additional demand and the type of indoor and outdoor sports required. The New Development Pitch Calculator and Sports Facility Calculator are the starting point and should be used in conjunction with an up to date PPS and Built Facilities Strategy. Please contact the undersigned for more information.			
Sport England	**Supplementary Planning Document** EH5: Public Open Space: Sport England would like to see part 1 of this policy amended to: "Minimum open space should be provided in accordance with Policies CS21 and CS27 of the Core Strategy, and the requirements of the Developer Contributions Supplementary Planning Document, **except for Outdoor Sport which should be informed by the Council's Playing Pitch Strategy**. The final spatial extent, distribution and form of open spaces within the site will be agreed with the Council as part of the masterplanning process.	The SPD and Masterplan content on the requirement for pitch provision is informed by the Council's currently adopted policy. As such, a reference to the playing pitch strategy can be added in.	Added in reference to Playing Pitch Strategy at EH5 point 1).	No
Sport England	**Supplementary Planning Document** Paragraph 5.3: Sport England would like to see the following included in the list of available guidance: 'Natural Turf for Sport' (Sport England 2011) https://www.sportengland.org/facilities-planning/design-and-cost-guidance/natural-turf-for-sport/ Active Design (Sport England 2015)	These documents are useful reference points and can be added in.	Added Sport England documents to the list at 5.3	No

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/			
Sport England	**Supplementary Planning Document** Chapter 5 Development and Design Principles: Sport England would like to see reference to the principles of Active Design included within this chapter. Sport England and Public Health England has prepared guidance called 'Active Design' which helps planners, developers and suchlike to incorporate key principles into new development which creates physical activity opportunities. The guidance can be found using this link: https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/	Many of the active design principles are already reflected in the SPD content both in EH8 and elsewhere. As noted above, the guidance documents have been added to the SPD.	No	As above
Sport England	**Supplementary Planning Document** EH8 Design Principles: Sport England would welcome the inclusion of the following bullet point or similar within this policy *"The use of active design principles should be used to support healthy lifestyles, including through making physical activity an easy, practical and attractive choice."*	As noted above, the Sport England guidance document has been added as noted above, and many of the principles are already enshrined in the SPD and masterplan.	No	As above
United Utilities	United Utilities wishes to build a strong partnership with all Local Planning Authorities (LPAs) to aid sustainable development and growth within its area of operation. We aim to proactively identify future development needs and share our information.	This is noted and welcomed. The Council welcomes UU's involvement in the process of preparing the masterplan. The comments with respect to the need for	No	Add in reference in utilities section to the availability of

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	This helps: - ensure a strong connection between development and infrastructure planning; - deliver sound planning strategies; and - inform our future infrastructure investment submissions for determination by our regulator. **Continued communication with United Utilities** United Utilities wishes to highlight that we wish to continue the constructive communication we have had with the Local Planning Authority throughout the masterplanning process so far and wish for this to be continued with the subsequent developers to ensure a co-ordinated approach to the delivery of the East of Halewood allocation. We cannot emphasise enough the importance of early, effective dialogue to help ensure a smoother delivery process. United Utilities will seek to work with each developer to identify any infrastructure issues and appropriate resolutions for the entire allocation. It is highlighted in the consultation documents that United Utilities has infrastructure passing through each scheme and we appreciate the approach to the masterplan layout that avoids critical infrastructure. However, it is important to note that it is the applicant's responsibility to demonstrate the exact relationship between any United Utilities' assets and any proposed scheme. Some of these assets have additional legal easements. Whilst we recognise the existence of legal easements is a	applicants to demonstrate the relationship with UU infrastructure and assets are noted. We hope that the masterplan goes some way to highlighting the importance of addressing utility constraints within the planning process. We would be happy to add into the masterplan a sign post to the UU free pre application service.		pre application services from UU.

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	private property matter, it is critical that the applicant is aware of their existence and the limitations they may potentially place on the proposal. All UU assets and associated easements will need to be afforded due regard in the delivery process and it is important that future applicants are aware of their location. We would encourage that future developers use our **free pre-application service** to discuss their schemes and highlight any potential issues. As mentioned, we cannot stress highly enough the importance of contacting us as early as possible. Enquiries are encouraged by contacting: Developer Services – Wastewater Tel: 03456 723 723 Email: WastewaterDeveloperServices@uuplc.co.uk Website: http://www.unitedutilities.com/builder-developer-planning.aspx Developer Services – Water Tel: 0345 072 6067 Email: DeveloperServicesWater@uuplc.co.uk Website: http://www.unitedutilities.com/newwatersupply.aspx We strongly advise that contact is established at the earliest stage, ideally before any land transactions, and certainly prior to any application to explore options early as possible.			
United	**The Challenge of Large Sites and Delivery**	We welcome UU's ongoing support for	No	No

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
Utilities	**Mechanisms** We are pleased to note that the SPD and Masterplan identifies the need for a comprehensive approach to guide the delivery as separate applications come forward. This helps to ensure the infrastructure requirements are met for the entire allocation. There is policy reference as part of EH13 in the SPD for infrastructure requirements that highlight that the masterplan should be accompanied by an infrastructure delivery plan. United Utilities welcomes this approach, which is a reflection of the discussions with Local Planning Authority throughout the masterplanning process. However, it is important to mention requirements set out in an infrastructure delivery plan can still be diluted as a consequence of fragmented land ownership. The experience of United Utilities is that where sites are large and in multiple ownership, the achievement of sustainable development can be compromised by developers/applicants working independently. It is important that the proposed phasing and infrastructure schedule/requirements outlines that each development phase must have unfettered access to available infrastructure, and is not prevented by third party land issues. We would recommend the following wording be considered for EH13 in the SPD, and for Part 5 of the Masterplan, which can be amended for preference:	ensuring that effective delivery of infrastructure should not be constrained by land ownerships – the masterplan includes a section specifically related to this issue. We have endeavoured to identify areas where landowners, and the developers, of constituent parcels, need to work together to achieve a comprehensive and efficient approach to infrastructure. With respect to drainage, the masterplan seeks to strike a pragmatic balance between recommending a comprehensive solution, while recognising there needs to be some flexibility in how this is achieved through individual development parcels. This flexibility is important to accelerate the timely delivery of the site, and to minimise the risk of time and/or monetary ransoms associated with land ownerships. Developers will need to demonstrate how their approach aligns with the Masterplan, and UU will also be consulted on individual development proposals. We consider that there is already sufficient reference to this within the masterplan delivery section.		

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	New development should provide evidence of early dialogue between developers and infrastructure providers to identify infrastructure needs arising from new development and ensuring that these are addressed through building design, utility networks and connections in time to serve the proposed development. This must include evidence of how the development is to be delivered as part of interconnecting phases, demonstrating linkages in accordance with the masterplan and providing evidence of unfettered access between adjoining parcels to prevent a piecemeal approach to infrastructure. With respect to surface water, the above is critical because of the challenge of early phases that prevent later phases from sustainably discharging to a watercourse / waterbody. There are a number of sustainable drainage options within the layout and it would be disappointing to see them not being available to developers due to third party issues. Acquiring the right to discharge surface water to watercourses can inhibit the delivery of sustainable surface water management if not considered carefully, i.e. it is the landowner of the watercourse that owns the right to discharge. The need to ensure discharge rights are acquired as part of the land transaction process should be a clear expectation of the Masterplan for applicants to demonstrate to ensure the most sustainable and strategic approach to the delivery of drainage infrastructure is achieved. It is appreciated that contact is likely to have taken place with all landowners but we urge you to challenge			

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	landowners on whether such rights to discharge have been attained and they can be demonstrated prior to planning application stage. It must be highlighted that we do not raise this point with a view to securing unreasonable contributions to improving our own infrastructure but rather to ensure a co-ordinated approach to the delivery of infrastructure especially in the context of fragmented land ownership. We want to highlight our concerns at this stage so that Knowsley Council can consider them as soon as possible before further engagement with landowners and developers.			
United Utilities	**Delivery expectations - Green Infrastructure Network and Surface Water Management** Throughout both documents there is an expectation for future development to provide significant amount of green infrastructure. United Utilities appreciates the reference made to use the green infrastructure network as part of the SuDS provision for new development. This is reflected in the preferred masterplan layout. As a result of this approach, there are sufficient options to ensure the sustainable discharge of surface water as part of the preferred layout. The surface water hierarchy identifies the public sewer as the least preferable option for the discharge of surface water and we would like to note that only foul flows will be expected to communicate with the surrounding combined sewer network. This will be expected for all future applications that come	Noted. We agree with UU's position here, which reflects national policy. We agree that the suggested addition could be helpfully incorporated into the SPD at section EH7, and clarification that only foul flows will be expected to enter the UU sewer network, can be added to the masterplan.	Added in suggested addition to EH7 point 2).	Added in that only foul flows will be expected to communicate with the surrounding combined sewer network. This will be expected for all future applications that come forward in the masterplan area

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	forward in the Masterplan area. Alternative options are likely be available, due to the provision of green infrastructure, and it is felt the Masterplan should reference that the expectation for future development is for foul only connections to the public sewer. There would be an expectation from United Utilities for any associated application to demonstrate the surface hierarchy fully has been assessed by the applicant as part of a submitted drainage strategy. We would wish for this expectation to be referenced by the Local Planning Authority at this stage so that applicants submit clear evidence as to why more sustainable options have been discounted. This should be discussed in further detail with your colleagues at the Lead Local Flood Authority. As a result we would recommend the following addition to point 2 of EH7 in the SPD: ***EH7: Utilities and Services*** *2) Unless otherwise agreed with the Council and United Utilities, the masterplan and subsequent planning applications shall deliver a comprehensive drainage strategy for the site that demonstrates a full assessment of the surface water hierarchy for each development parcel.* As mentioned, we are happy to note that the Masterplan has allocated land to genuine, above ground SuDS features. It is recognised the significant role that design plays when it comes to maximising such features and we are pleased such			

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	considerations are included, but we would like to highlight our expectations as part of the delivery process to help prevent any unnecessary issues arising within the Development Management Process.			
United Utilities	**Water efficiency measures** United Utilities would encourage the use of design techniques in new development like rainwater recycling, green roofs, water butts and permeable surfaces that help to reduce pressure on public water supply and the public sewerage system along with mitigating the impact of potential flood risk both within and beyond a site boundary. We feel that there is an opportunity as part of the SPD to add a requirement for all new development to encourage water efficiency measures/techniques as part of the design process, whilst ensuring potential is minimised for urban diffuse pollution to affect the surrounding watercourses and water bodies. In respect of applying such measures to new development, we recommend the following is added to Policy EH11 of the SPD: *'Where identified as necessary in consultation with infrastructure providers, applicants will be required to provide evidence and details of mitigating measures to support their proposals considering the impact on public water supply resources and utility infrastructure.'*	Agree that there could be a useful addition to the SPD here, to reflect UU advice and also the content of the Local Plan Core Strategy with respect to sustainable development. Suggest slightly revised wording, for consistency of phrasing with this part of the SPD, as follows: EH11, part e: "where appropriate, evidence of the inclusion of a sustainable approach to water management". This is also reflected in the masterplan.	Added to SPD section EH11 as set out.	No

Statutory Consultee	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
United Utilities	**Summary** Moving forward, we respectfully request that the Council and associated developers continue to consult with United Utilities regarding the East of Halewood allocation. We are keen to continue discussions to ensure that all new growth can be delivered sustainably and are happy to discuss the content of this representation in more detail.	Noted and welcomed.	No	No

Table 5.4– Landowners and Developments - detailed comments and Council response

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
Lichfields	1.9	The Housebuilders have emphasised throughout the Masterplan/SPD process that deliverability is paramount. The draft Masterplan should ensure that each plot can be developed independently of every other plot, providing that it contributes to the comprehensive development of the SUE as a whole.	We disagree with this contention – our view is that completely independent delivery of parcels is not achievable, given the interdependencies between parcels in relation to different categories of infrastructure. It is not sufficient to simply say parcels will make a contribution towards comprehensive development – in our view, clear recognition of interdependency is needed to ensure deliverability of the masterplan.	No	No
Lichfields	2.2 (1)	The draft Masterplan incorporates an ownership plan although it should be noted that this is indicative only.	The ownership plan is based on Land Registry records and information from the housebuilders and therefore is not just indicative. The final masterplan will include an updated land ownership plan, which clearly states it is based on Land Registry records, correct at the time of publication.	No	Land ownership plan to be accompanied by "(as of the date of publication of this document)".
Lichfields	2.4	The Housebuilders are collectively proposing to deliver between 1,300 and 1,400 dwellings across Plots 1 - 5. The principle of this quantum of residential development has been accepted by the Council and is reflected in the draft Masterplan.	We acknowledge that the housebuilders control the majority of the site, however the overall capacity of the site is higher, including additional land outside of the control of the housebuilders. The Masterplan does not indicate an	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
			upper capacity for the site, but instead considers approximately 1,500 homes to be the maximum number of homes that could be accommodated (subject to the planning application process).		
Lichfields	3.3	Housebuilders would share technical evidence with OPEN which could underpin the Masterplan process. Whilst the Housebuilders have participated in several workshops where draft Masterplan options, and subsequently a Preferred Option were presented, we were not made aware of the full extent to which the scope of the Masterplan had changed from being a single plan to a full comprehensive document. This has had significant implications on the timescales associated with the delivery of the project with the Housebuilders unable to progress their proposals.	This is disputed; the landowners, developers and Lichfields were invited to several sessions with the Council and OPEN during 2018 and early 2019, during which it was made clear that the Masterplan would be more than a single plan. We do however acknowledge that there have been extended timescales associated with preparing the Masterplan.	No	No
Lichfields	3.6	It should also be noted that there are a significant number of typographical errors in the document.	Noted – these have been corrected in the final version of the masterplan and SPD.	Check completed before final version adopted	Check completed before final version approved
	Masterplan				
	Broad Matters				
Lichfields	3.7	Firstly, the Housebuilders share the view that the scope of the draft Masterplan goes significantly further than what we consider to be reasonably necessary for a Masterplan. Its intended function is to	The public consultation period represents the main opportunity for detailed comments on the Masterplan; clearly the detailed Lichfields comments reflect this. Prior	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		set a development framework without constraining the overarching deliverability of the site. Whilst we appreciate that the document sets out the Council's aspirations for the site, there has been limited communication with the Housebuilders in respect of considerable matters of prescriptive detail included within the document.	to this, we have engaged with the housebuilders and landowners on the preparation of the Masterplan at different stages, as mentioned above.		
Lichfields	3.8	In this regard we are concerned that the document is potentially misleading to members of the public given that the feasibility and viability of much of the content is yet to be tested. We understand that the Council wish to achieve a high-quality, comprehensive development at East Halewood and the Housebuilders share this aspiration. However, there are significant cost implications associated with many of the proposals. We believe it is misleading to suggest all of this will be delivered before the implications on cost and viability have been fully considered. It is therefore important that the document makes it clear that the design guidance is indicative only and will be subject to further viability testing to ensure deliverability. It is considered that this should have taken place in advance of the document being published for consultation. Furthermore, the viability evidence should have accompanied the	We have acknowledged that the Masterplan needs to be supported by robust evidence in relation to deliverability and viability. This was clearly set out in the delivery section of the draft Masterplan, therefore we do not consider that the consultation draft was misleading on this matter. Working with consultants Keppie Massie, the Council has now finalised this evidence, with input from the housebuilders. Its high level conclusions will be reflected in the final Masterplan document.	No	Final masterplan includes content reflecting the final deliverability and viability evidence, see Implementation and Delivery section

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		draft document. The Housebuilders have grave concerns that the impact of the draft Masterplan and SPD on deliverability has not been tested. Nor has it been the subject of discussion in advance of the publication. The Housebuilders wish to engage with the Council in a positive and proactive way; however, they cannot do so in the absence of such information. We therefore request that the information is made available as a matter of urgency; and reserve the right to make further comments on that information in due course.			
Lichfields	3.9	The draft Masterplan, at 220 pages is considered to be unwieldly. This makes it difficult to digest, review and apply in a cohesive manner. In our view this is unnecessary, and the content of the draft Masterplan could be presented in a condensed manner, without losing any of its value and purpose. There is considerable repetition throughout the draft Masterplan, as well as across the supporting documents, with a significant proportion of plans, images and tables. Whilst we appreciate that plans and images can assist in visually illustrating the meaning of text, there are a number of plans and images that appear cluttered and confusing. In summary, we believe that the draft Masterplan could	Where possible and appropriate, we have identified opportunities to review and condense the Masterplan, reduce duplication in its content and improve the presentation of plans, images and tables.	No	Final masterplan drafting and review has considered opportunities to condense and simplify content throughout.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		be condensed to achieve a more workable, to the point and effective document that sets out a robust and deliverable Masterplan Framework in a more coherent and digestible manner.			
	Introduction (01)				
Lichfields	3.10	Paragraph 1.10 sets out the Masterplan objectives in seven points. Point 1 states that the Masterplan 'confirms' the vision and development principles for the site, shaped by stakeholder collaboration (and now public consultation). However, whilst the Housebuilders have participated in a number of workshops where Masterplan options, and then a preferred option were presented, there has been no significant engagement in terms of the development principles and prescriptive design guidance set out in Section 06. Therefore, we would argue that the vision and development principles for the site have not in fact been shaped by stakeholder collaboration. Therefore, the word 'confirms' should be amended to '***proposes***' and the reference to stakeholder engagement should be **deleted**.	We disagree with the contention that housebuilders have not been involved in the vision and principles, this was covered at a workshop in 2018. We also held a workshop in early 2019 which covered the emerging design guidance, at which comments from housebuilders shaped the content appearing in the consultation draft. We disagree with the proposed wording change. In any case, the Masterplan has been subject to public consultation including various forms of stakeholder engagement prior to finalisation. The final Masterplan summarises this process and how feedback has been incorporated into the plan, with reference to the consultation report.	No	Final masterplan explains process of preparation.
Lichfields	3.11	Point 5 states that the document provides masterplanning and design principles and guidance, to inform the more detailed design considerations and	We disagree with the proposed wording change; the final Masterplan will be supported by robust evidence in relation to deliverability and	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		approaches needed to deliver the vision for the site. Given that the implications of the proposed design guidance on viability and deliverability are still being tested by the Council, it is suggested that this statement is amended to make it clear that the document provides; ***indicative*** *masterplanning and design principles and guidance* ***which is subject to further testing in respect of deliverability and viability***.	viability, hence this wording will not be relevant to include in the final version.		
Lichfields	3.12	In terms of Point 6, it is stated that the Masterplan describes the proposed approach towards delivery and phasing of physical infrastructure. However, it is not envisaged that the development will require any particular phasing programme in respect of the delivery of physical infrastructure. All three developers must be able to bring forwards their respective developments independently because they will inevitably be undertaken at different times and at different rates. Notwithstanding this, they intend to work closely together to ensure the site is developed in a logical manner. Therefore, the comment should state that: *"the Council will work with the housebuilders to establish an agreed approach towards delivery and phasing*	We disagree with this point – while we do not anticipate that a prescribed phasing of parcels coming forward for development will be necessary, we do consider that the delivery of physical infrastructure will need coordination in terms of timing of delivery – hence "phasing" is an appropriate word to describe this. We therefore do not consider that Point 6 needs to be amended.	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		of physical infrastructure."			
Lichfields	3.13	Point 7 states that the draft Masterplan provides a framework for legal agreements and conditions to be established through the planning process. It is noted that the Council has not yet published the evidence base to support requirements for S106 contributions and that this will be agreed in due course. Whilst potential requirements are listed in Table 7.3 (Page 204), we are aware that further work is currently being undertaken by the Council to underpin these requirements. It has been agreed with the Council that the Housebuilders will have the opportunity to comment further in due course when further information has been made available.	Agreed and noted. The final Masterplan includes further detail on the s106 roof tax asks and justification for these. The content of the final Masterplan is the result of discussing these matters with the housebuilders, particularly with respect to viability evidence.	No	The final masterplan includes various revisions to the Implementation and Delivery section in this regard.
	Vision (02)				
Lichfields	3.14	The text in the red banner at the top of page 8 suggests that the site will be a place served by "excellent infrastructure". However, this suggests the development will exceed policy requirements and current standards, and there is nothing within the KLPCS that requires this. For example, Policy SUE2 indicates the development should be of a high design quality. Use of language like excellent is misleading and suggests a higher bar than is found	The vision was worked through with house builders during early workshops. We do not consider that the term "excellent infrastructure" is problematic in this context – this is a vision statement, which is by its nature aspirational. We disagree that this implies an exceedance of policy requirements, as set out in the Local Plan, and draft SPD and Masterplan.	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		in Policy. This language should be reconsidered to align with the language used in policy.			
Lichfields	3.15	In bullet 2 (page 8), the second sentence should read: *will be a purposeful and attractive green space that is **a** destination in its own right*.	Noted.	No	Typo corrected in final Masterplan
Lichfields	3.16	Bullet 3 goes on to state that the development will provide a; *high quality and accessible streetscape and hierarchy that allows residents and visitors, whether on foot or in a vehicle, to safely and easily navigate their way to and around the development*. The Housebuilders are concerned that the draft Masterplan includes a number of proposals that would reduce public safety. For example, the proposals to open up the railway arch adjacent to Lower Road for a public footpath. I address the Housebuilders concerns in this regard at paragraphs 3.97-3.98. Other than the two comments highlighted above, the Housebuilders are supportive of the vision concept set out on page 8.	We do not consider that our proposal to open up the railway arch on Lower Road would reduce public safety; on the contrary, it would ensure that there is a wider footway than currently provided. We have responded below to further comments.	No	No
Lichfields	3.17	In terms of the Vision Concept Diagram (Figure 2.1, page 9), whilst we appreciate that this is indicative, it	We do not consider that the concerns noted here would merit deleting what is a useful vision concept diagram,	No	A key has been added to this image.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		appears to show an exaggerated scale of Public Open Space [POS], for example, the green corridor shown running through Plot 3 and in particular on Plots 1 and 2. We are concerned that this plan is misleading as it appears to identify parts of the site as POS that exceed the areas actually identified as POS on the Framework Masterplan (Figure 5.3, page 41). It is therefore considered that Figure 2.1 should be **deleted**	which explains the high level structuring principles for the development of the detailed masterplan framework. It shows "key moves" and is not intended to show quantum or scale of spaces. Later, more detailed plans, notably the Framework Plan, refine this diagram. There is no suggestion that applicants will be held to deliver the spaces within this diagram rather than the more detailed Framework Plans which follow.		
Lichfields	3.18	Placemaking principles are set out between pages 10-13. In general, the Housebuilders support the stated principles but have the following comments: 1 Criterion C1 (page 10) states that the development should provide; *a street layout that looks outwards as well inwards*. This comment is considered to lack clarity as it suggests that a street layout can look both outwards and inwards at the same time. Outward facing dwellings should be supported by private drives as a principle. In order to achieve this principle, private driveways should be longer than 3 dwellings. This matter is addressed further at paragraph	Point 1: This point relates to the street layout across the whole site, which will necessarily at different points look outwards from the East of Halewood site, as well as inwards, internally to the site. We will revise the wording to make this clear. Notwithstanding the point that these place making principles are not the appropriate point in the document to prescribe the use of private drives, we disagree that outward facing dwellings require private drives in principle; clearly this can also be achieved through direct access from the existing highway, where appropriate. Point 2: Agreed that this point would benefit from clarification that it relates	No	C1 – rewritten for clarity as follows: *A street layout that looks outward, connecting meaningfully to the rest of Halewood and addressing the urban edge; as well as Inward, addressing its internal streets and spaces* C3 amended to clarify what connectivity is referred to, as follows: *Possibilities for connections between the parcels to the north*

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		3.96. 2 Criterion C3 (page 10) refers to possibilities for connections between northern and southern parcels. It is unclear whether this refers to developers respective parcels or the wider parcels e.g. north/south of the railway line. This should be clarified. In terms of a connection between the wider northern and southern parcels, the sites are divided by the Liverpool to Manchester (via Warrington) railway line. Notwithstanding this, a vehicular and pedestrian connection already exists via Lower Road. Further opportunities to improve this connectivity are limited. Notwithstanding this, improvements are proposed to the existing footways on Lower Road, on the north-western approach towards the railway bridge in order to improve pedestrian connectivity between the parcels. Further commentary is provided in respect of this matter at paragraphs 3.97-3.98. 3 Criterion H1 (page 11) refers to housing types and products, including affordable housing that can attract a range of new people to live in the area and help to address current local and city region needs. At this stage, the Housebuilders	to connections between main parcels (i.e. those separated by road and rail infrastructure) – and also within the parcels. Point 3: The Knowsley Local Plan makes clear its policy response to addressing affordable housing needs, in that SUE sites will need to provide 25% affordable housing. At Table 5.2 of the draft Masterplan, we have set our proposed affordable housing mix for the site. If through the application process, housebuilders wish to propose an alternative mix which reflects local evidence, the Council will be able to consider such submissions at that stage. Point 4: As noted above, while we do not anticipate that a prescribed phasing of parcels coming forward for development will be necessary, we do consider that the delivery of physical infrastructure will need coordination in terms of timing of delivery – hence "phasing" is an appropriate word to describe this.		*and south of the railway line* No further changes considered necessary.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		have not seen any evidence on what current local needs are although we understand that the Council will be publishing further evidence in respect of this. On this basis, the Housebuilders want to reserve the right to comment on this matter further when the evidence is available. 4 Criterion CH2 (page 13) states that the Masterplan will ensure appropriate and effective phasing and delivery. It is important that the draft Masterplan clarifies that phasing will be established in conjunction with the Housebuilders in due course and as part of the planning application process. It is envisaged that the development will be phased naturally, with all three developers bringing forwards their respective developments simultaneously.			
	The Site (03)				
Lichfields	3.19	At paragraph 3.2 on page 14 the start of the final sentence should read: "*To **the** north*…"	Noted – typo will be addressed in final masterplan.	No	Typo corrected in final Masterplan
Lichfields	3.20	In respect of the text contained within the red box on page 14, the Housebuilders welcome the Council's ongoing discussions with the government to unlock additional funding	Noted and welcomed. Reference to external funding has been added to the final masterplan delivery section.	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		of over £1bn to promote growth and development locally. There could be an opportunity for this funding to unlock elements of the draft Masterplan that would not otherwise be achievable due to viability and deliverability constraints. The Housebuilders would welcome further discussions with the Council in respect of available funding streams and how this could complement the development proposals at East Halewood.			
Lichfields	3.21	Paragraph 3.5 (page 14) sets out that a summary of the key issues, constraints, strengths and opportunities is set out on the following pages. This analysis has been undertaken by OPEN, albeit with input on the baseline from the Housebuilders team. This should be reflected in the text. The SWOT analysis is then provided on the following pages in the form of visual figures and text summaries. The Housebuilders have the following comments : 1 Figure 3.1 (page 15) – The boundary line to the north/north-east of Plot 1 should run along the centre of Ditton Brook. Redrow would be happy to provide a shapefile depicting the site boundary for Plot 1 should this assist in correcting the discrepancy.	We would be happy to clarify that this analysis has been undertaken by OPEN, with input from the housebuilders. Point 1: We have included the latest correct records on land ownership in the final masterplan. Point 2: Updated ecological evidence included in the final masterplan, removing reference to GCN. Point 3: Noted – this will be rectified. Point 4: We disagree that the plan designation implies that the EFC training ground forms part of the SUE – the SUE boundary is clearly shown as a red line. We can however review how surrounding land is shown in	No	3.5 has been changed to clarify that the analysis has been undertaken by OPEN with input from the housebuilders. Correct site boundary running along the centre of Ditton Brook has been shown in the final Masterplan. Reference to potential for GCN has been removed. Key item for 11kv power cable has been added and the plan corrected.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		2 Figure 3.2 (page 16) – In respect of key issues and constraints, this plan identifies a number of ponds on the site as having an average/good rating for use by Great Crested Newts [GCN]. However, the Housebuilders have undertaken a comprehensive package of ecological assessments on the site and no GCN have been identified. This information was previously made available to OPEN. The reference to GCN should be **deleted** as extensive survey work has already established that there are no GCN present on the site (or in close proximity to it) and therefore this is not a constraint. 3 Figure 3.2 (page 16) – The 11kv cable crossing Plot 1 is indicated as 132kv cable on key. This needs to be corrected. 4 Figure 3.2 (page 16) – It is unclear why areas outside of the site are generally coloured in and distinguished as being outside the SUE, whilst the Everton Football Club [EFC] training ground is shown with a white backdrop as if it sits within the SUE. This issue is prevalent across many of the figures within the draft Masterplan. A consistent approach should be taken which makes it clear that the	general, to remove any risk of uncertainty around this.		Plans have been reviewed to provide clarity about surrounding land uses.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		EFC training ground does not form part of the SUE and lies within the open countryside and is designated as Green Belt.			
Lichfields	3.22	Pages 17-19 go on to provide text summaries of the perceived issues and constraints. In a general sense, the table (Table 3.1) contains a lot of text and is difficult to digest. Furthermore, subject to the above comments, we contend that Figure 3.2 sufficiently identifies the issues and constraints associated with the site. On this basis, we suggest that the table is either **deleted** or appended. Notwithstanding this, the Housebuilders have the following comments on the text in table 3.1: 1 Column 2, page 17 (noise) – Bullet 2 refers to the two railway lines as having a noise and vibration impact on the site. Whilst this is acknowledged, the noise assessment undertaken by the Housebuilders has identified that no significant noise and vibration issues exist in respect of the Manchester to Liverpool (via Warrington) railway line, which runs between Plots 2 and 3. In contrast, in respect of the southern railway line, the Hesketh land parcel is likely to require a 50 metre stand-off	We disagree that this table should be deleted – it provides significant further detail about the constraints associated with the site, in addition to those shown on Figure 3.2. Point 1: We agree that the two railway lines will have differing impacts, which has been reflected in the version of this table which appears in the final masterplan. Point 2: Agreed, table has been updated to reflect that the phased closure of the RSPCA is no longer a constraint, given the centre's closure in May 2019. Point 3: We agree that noise constraints from Everton FC's facility are likely to be limited, but further evidence will be required to confirm this at the planning application stage. Point 4: We agree to the addition of clarifications on source of easements – this will be reflected in the final masterplan.	No	Table 3.1, noise commentary updated to reflect differing constraints of the two railway lines. Referenced to phased closure of the RSPCA removed. Clarification to reflect limited impact of noise from EFC added, but keep in caveat that further testing needed at application stage. Final masterplan includes clarifications on source of utilities easements Alignment of 132kv cable updated on Figure 3.2. Reference to electricity infrastructure on northern parcel (11kv

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		to any residential property, combined with acoustic screening and bunding as acknowledged in bullet 3. On this basis, bullet 2 should be updated to distinguish between the varying impacts of the two-railway lines and acknowledge that the impact from the northern railway line will have limited impact from a noise and vibration perspective. 2 Column 2, page 17 (noise) – Bullet 5 refers to the phased closure of the RSPCA site. This should be removed as there will be no phased closure of the RSPCA site, it will simply close ahead of development commencing. 3 Column 2, page 17 (noise) – Bullet 6 states that the EFC training ground is a noise source but doesn't acknowledge that the impacts on the proposed development have been found to be limited. 4 Column 4, page 17 (utilities) – This section refers to a number of prescriptive easements in relation to various infrastructure but does not state where these requirements have come from. The Housebuilders would welcome clarity on whether the easements been confirmed by utilities providers.	Point 5: Alignments of the 132kv power cable need to be updated, however it is correct that the cable crosses the railway line (east of Yew tree farm). Reference to infrastructure on northern parcel is the 11kv line; this needs to be clarified in the final masterplan. Point 6: We have responded below to later detailed comments on this matter. Point 7: Agree that conservation area is not 'adjacent' to the site, and proposals at East of Halewood are unlikely to affect its setting. Point 8: We disagree with this point, the lack of footway on sections of Finch Lane is a constraint, as this is a road directly bounding the site, which is expected to have increased pedestrian use following development. Point 9: We do consider that one train an hour is low frequency, particularly for an urban area with the population the size of Halewood. We will continue to lobby for improved rail services for Halewood, particularly in response to this development. While we agree there		cable) clarified. Clarification added to confirm that conservation area is 300m away and development is unlikely to impact on its setting. Clarification on educational and healthcare needs has been provided in the final Masterplan. Clarification on the role of EFC pitches and the outdoor sports requirement (through developer contributions) have been provided in the final Masterplan. The final masterplan provides further clarification as to the role and function of the NIA / FSA, particularly in terms of its POS function

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		5 Column 4, page 17 (utilities) – Bullet 1 states that the 132KV power line crosses the Liverpool to Manchester railway line. This is not correct and should be amended. The 132KV power line runs across the south-eastern portion of Plot 3. Likewise, the reference to the 'extra high voltage power line' on the northern parcel (bullet 5) is also incorrect. 6 Column 4, page 17 (utilities) – Bullet 6 refers to the substation located adjacent to the south-western corner of Plot 2. It is stated that; *initial discussions with Scottish Power suggest that this could be relocated to the centre of the new load generating area*. The substation is located on land outwith the control of the Housebuilders. This matter is addressed in more detail in our response to Section 05f of the draft Masterplan (§3.57-§3.64). 7 Column 2, page 18 (heritage) – Bullet 3 suggests that the Halewood Village Conservation Area [CA] is located adjacent to the site. The closest edge of the CA is in fact located over 300 metres from the western edge of the SUE and a heritage assessment has confirmed that the development will have no impact on the character and setting	are bus services into Liverpool, the train represents a much shorter journey time, as well as direct access to further destinations (Manchester, Warrington, etc). Point 10: We acknowledge that the Masterplan needs to provide further clarification as to the role and function of the NIA / FSA, particularly in terms of its POS function. Notwithstanding this, we consider that the draft Masterplan broadly does accord with the constraint of not promoting "development" – i.e. Built residential development – in the NIA designated area. Point 11: We disagree that COMAH is not a relevant constraint to the site. While none of the restricted uses are proposed in the Masterplan, it is still helpful to acknowledge this, particularly in relation to some forms of housing (such as extra care) which could fall into restricted categories. In addition, the HSE have advised that new residents will need to be advised of the hazard, as set out in table 7.1. It is therefore relevant to note COMAH as a constraint. Point 12/13: We have agreed to provide evidence of educational		

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		of the CA. As such, this should be **deleted** as a constraint. 8 Column 3, page 18 (transport) – The lack of footpaths along Finch Lane to the north of Finch Farm is not considered to be a constraint as no access is proposed in this location. 9 Column 3, page 18 (transport) – It is stated that rail services between Liverpool and Manchester stopping at the Halewood railway station are low frequency despite there being a rail service once an hour. We consider this to be proportionately reasonable. Furthermore, Halewood is well served by local bus services with approximately 4 buses an hour into Liverpool. 10 Column 4, page 18 (ecology) – Bullet 2 states that development should be avoided in the Nature Improvement Area [NIA]. However, there are references elsewhere within the document that contradict this (e.g. the proposals shown at page 189 which suggest that the NIA could be used as functioning POS). It needs to be clarified throughout the document that the NIA will not be functioning POS. 11 Column 3, page 19 (COMAH) – This section refers to the fact that part of the site is located within a	needs and health care needs in support of developer contributions asks, which can be shared with the housebuilders. Point 14: Further detail on the approach to POS is provided in the Masterplan. Table 3.1 simply explains that as a SUE site, the expectation is that on site POS will be provided. The final Masterplan will need to clarify the role of the EFC pitches (which are understood to have no community access, and be exclusively for the use of EFC-affiliated programmes), and hence the requirement for contributions towards outdoor sports in Halewood to meet the needs arising from the development.		

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		Control of Major Accident Hazards [COMAH] consultation zone. It then goes on to list the types of development that are restricted within the COMAH zone. This includes schools, nurseries and care homes. However, none of these uses are proposed on the site and none feature on the Masterplan and therefore the site is not constrained in respect of COMAH. The Health and Safety Executive [HSE] have already confirmed that they have no objection to the proposals at East Halewood. As such, this should be **deleted** as a constraint. 12 Column 4, page 19 (education) – Bullet 2 refers to limited capacity in nearby schools and suggests that extended capacity will be needed. However, no evidence has been made available to support this contention at this time. It has been agreed with the Council that the Housebuilders will have a further opportunity to comment on this matter (and others) in due course once the evidence base has been completed and made available. 13 Column 5, page 19 (health) – As per comments above in respect of education, it has been agreed with the Council that the Housebuilders			

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		will have a further opportunity to comment on health requirements in due course once the evidence base has been completed and made available. 14 Column 6, page 19 (POS) – Bullet 1 states that the East of Halewood site will need to be self- sufficient in Public Open Space [POS], against the Council's standards for provision. However, the Masterplan suggests that the majority of the POS will be located within Finch Woods, outside of the housebuilder's parcels. We understand that financial contributions in the form of commuted sums will be sought towards this. This should therefore be clarified in the text with the caveat that the POS requirements will ultimately be subject to negotiations between the Council and the Housebuilders. However, if the expanded Finch Woods would provide POS to serve the wider area, it would not be reasonable or proportionate for the cost of providing it/maintaining it to fall exclusively on the Housebuilders. Bullet 3 acknowledges the proposed community pitches associated with the EFC facility but then goes on to suggest that the			

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		East of Halewood development will need to make a contribution towards the provision of new and improved pitches at Halewood Leisure Centre. However, the Housebuilders understand that the EFC extension north, adjacent to Lower Road will provide community sports facilities. As set out above [§3.22 – 12/13] in respect of health and education, it has been agreed with the Council that the Housebuilders will have a further opportunity to comment on POS requirements in due course once the evidence base has been completed and made available.			
Lichfields	3.23	Pages 20-23 provide text summaries of the perceived strengths and opportunities. As per the constraints section, the opportunities are first presented on a plan. The Housebuilders have the following comments: 1 Figure 3.3 (page 20) – The plan shows an arrow between Plots 1 and 2 which states there is an opportunity to create a pedestrian/cycle connection between the two plots, running into the NIA. However, the interface within Plot 1 between the proposed development and the NIA is subject	Point 1: Figure 3.3 shows high level opportunities, which are then worked through in further detail in the Masterplan. The inclusion of a potential walking and cycling connection between Lower Road and the open space to the north is indicative, the idea being to provide connectivity between parcels and open spaces. Notwithstanding this, we have agreed that the final masterplan will show an altered route for walking and cycling connections, moving this slightly south. Point 2: This comment goes into	No	The final masterplan provides further clarification as to the role and function of the NIA / FSA, particularly in terms of its POS function. It shows an altered route for the walking and cycling connection between Lower Road and Greensbridge Lane.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		to a dramatic change in levels which makes it unviable to provide a connection here. Furthermore, the NIA is also a floodplain and it is unclear why the Council would wish to direct cycles here. It is recommended that this is removed from the plan. 2 Figure 3.3 (page 20) – It is stated that there is an opportunity to achieve a positive frontage overlooking the Ditton Brook between the development on Plot 1 and the NIA. However, the Street Hierarchy Plan (page 85) suggests that only minimal private drives could be achieved between this frontage. It is unclear how a positive frontage could be achieved in this location in the absence of private drives. 3 Figure 3.3 (page 20) – In respect of Plot 5, it is stated that there is an opportunity for the'potential re-use of historic building'. This should be **deleted** as the building is not suitable for re-use. In addition, a pond is shown on this plot which should be removed as it has been largely accepted that this site will be served by a pumping station and this is reflected elsewhere within the draft Masterplan. 4 Figure 3.3 (page 20) – The arrow	detailed solutions – Figure 3.3 is simply about showing opportunities. Responses to these opportunities are worked through in more detail in the Masterplan. Point 3: Again, these comments address solutions – the role of this figure is to highlight potential opportunities, which are then worked through in the Masterplan. On this specific point, the Masterplan does not propose retention of the building or pond, but it is still relevant to highlight these as opportunities at this stage within the Masterplan document. Point 4: We disagree that this should be deleted. We continue to pursue with Network Rail the opportunity to open up a railway arch for a dedicated walking/cycling route – this is needed to address existing pedestrian safety issues, to ensure continuity in the cycle/footpath network proposed, and also represents an opportunity for a key place making asset for the site. Again, we have responded to later detailed comments on this matter. Point 5: Again, this plan shows broad opportunities and does not imply any		

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		identifying opportunities to open up redundant/open railway arches to create new pedestrian & cycle connections should be **deleted**. The Housebuilders contend that neither route would create a 'safe' connection between the northern and southern parcels, but rather create isolated areas that are devoid of natural surveillance and could lead to increasing opportunities for crime. This is addressed in more detail in the following sections. 5 Figure 3.3 (page 20) – In respect of the link shown through the site between the Halewood Leisure Centre and the EFC training ground marked as 'connectivity between community facilities', the Housebuilders welcome the acknowledgment that the EFC accommodates community facilities. It is envisaged that the community facilities at the EFC training ground will serve the East of Halewood development in respect of sports provision.	level of community access to EFC facilities. Indeed, our understanding is that these will not be accessible. As noted above, the final Masterplan will need to clarify the role of the EFC pitches, and the requirement for contributions towards outdoor sports in Halewood.		
Lichfields	3.24	Pages 21-23 go on to provide text summaries of the perceived key opportunities. As per our comments in respect of the constraints section, the Housebuilders are of the view that	As noted above in relation to Table 3.1, we disagree that this table should be deleted – it provides significant further detail about the opportunities associated with the site,	No	Clarification added that the primary noise constraint relates to Hesketh land

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		opportunities are sufficiently identified on Figure 3.3 and therefore these tables should be **deleted** or if not appended. Notwithstanding this, the Housebuilders have the following comments on the text in table 3.2: 1 Column 2, page 21 (noise) – It should be acknowledged here that, excluding the Hesketh land parcel, the site is not subject to any significant noise constraints. 2 Column 4, page 21 (utilities) – Bullet 3 states that; *ongoing discussions with utility providers are underway to relocate the existing substation on the corner of Greensbridge Lane and Lower Road to a more suitable location*. As specified previously, this substation and the land it sits on is not controlled by the Housebuilders and therefore they are unable to facilitate its relocation. The text should be updated to reflect that this is only an aspiration. 3 Column 5, page 21 (flood risk and drainage) – Bullet 3 acknowledges potential to use the proposed flood storage area [FSA] to; create an improved landscape setting and potentially an area for ecological / habitat improvement along the Ditton and Netherley Brook corridor and within the NIA. However, this	in addition to those shown on Figure 3.3. Point 1: As detailed above, we have agreed that the difference in noise constraints across the site can be recognised. Point 2: We disagree with this point. The relocation is required for a number of valid reasons including visual impact and highways safety; it is simply not acceptable for this facility to remain in situ. We have responded to later detailed comments on this matter. Point 3: We acknowledge that the Masterplan needs to provide further clarification as to the role and function of the NIA / FSA, particularly in terms of its POS function. However we don't agree that there is a contradiction here, we consider that ecological improvements can be delivered alongside other objectives. Point 4: This point is simply to identify an opportunity, rather than a proposed solution – it is therefore relevant to remain included in Table 3.2. We have tried to accommodate the housebuilders' aspirations for surface water drainage solutions, in		Further details about highway improvements needed are included in the final Masterplan. The final masterplan provides further clarification as to the role and function of the NIA / FSA, particularly in terms of its POS function

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		contradicts the unrealistic/undeliverable suggestions on page 189. 4 Column 5, page 21 (flood risk and drainage) – Bullet 4 states that there is an; *opportunity to establish a connected Surface Water Drainage Strategy across the entirety of the site*. The Housebuilders have provided considerable evidence to demonstrate that this is not feasible and justifying why the surface water drainage strategy as proposed is the only feasible/deliverable option in accordance with the SUDS hierarchy. It is therefore requested that Bullet 4 is **deleted**. 5 Column 6, page 21 (heritage) – As per previous comment with regards to the re-use of the existing barn on Plot 5, Bullet 2 should be **deleted**. 6 Column 7, page 21/Column 1, page 22 (transport) – This section lists a number of proposed upgrades to the existing highways. However, as far as the Housebuilders are aware, no evidence exists to support these proposals. For example, it is stated that there is an opportunity to re-configure Higher Road, but the transport assessment work undertaken by the Housebuilders does not conclude that this would	order to facilitate deliverability of the site. The final masterplan reflects this approach. Point 5: As per our earlier comments, it is still relevant to highlight this as an opportunity - on this specific point, the Masterplan does not propose retention of the building. Point 6: We acknowledge that further evidence is needed to support the identification of highways improvements, as well as details of the timing and method of their delivery. This is reflected in the final masterplan. Point 7: Noted, however we consider that section 6 of the Masterplan does not require development to respond to the existing character of Halewood in terms of architectural style, but rather in terms of taking cues from materials and details, which may be appropriate to incorporate in residential design, in order to provide local distinctiveness and enhanced character. Point 8: Further detail on how this is applied in the Masterplan is set out in design guidance in section 6.		

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		be beneficial. Caveats should be added making it clear that proposed highways improvements are subject to ongoing negotiations and the conclusions of a detailed transport assessment. 7 Column 4, page 22 (townscape) – Bullet 2 states that there is a; *lack of overriding architectural style or built character in the surrounding area and the positive acceptance of recent new development offers the opportunity to define a distinctive new character for East of Halewood*. The Housebuilders support this comment. However, it is contradictory to the subsequent design guidance section which focuses on requiring the development to respond to the existing character of Halewood rather than creating a new character for the SUE. 8 Column 4, page 22 (townscape) – In respect of Bullet 3, the Housebuilders would welcome clarity on what the 'local vernacular of Halewood' is at it is not defined in the Masterplan or SPD.			
Lichfields	3.25	Page 24 provides a summary of landownerships across the SUE. Paragraph 3.7 refers to a consortium of developers. However, the Housebuilders	The Council has received mixed messages about whether the housebuilders are a formal consortium or not, however we are	No	Reference to "consortium" and "options" removed; instead refer to our

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		are not a consortium and therefore this reference should be **deleted**. Paragraph 3.7 also states that the Housebuilders have; *engaged with a number of the landowners and have negotiated working under option agreements*. This is incorrect and should be **deleted** as it is not necessary for the draft Masterplan to discuss the nature of the agreements made between the Housebuilders and the respective landowners.	happy to remove this reference if this is considered problematic for any party. We are happy to remove references to options. Again, as previously requested, we would benefit from understanding the legal arrangements between landowners and housebuilders.		understanding of developer control / influence at the time of publication of the masterplan.
Lichfields	3.26	Figure 3.4 (page 25) visually identifies the land ownership boundaries. It should be noted that the boundary for Plot 2 (Bellway) is incorrect and includes land outwith their control. Bellway would be happy to provide a plan depicting the correct boundary.	We assume this comment relates to the exclusion of the private property on Lower Road and the substation – we would be happy to reflect this in the final Masterplan.	No	Bellway northern parcel extents updated on land ownership plans included in final masterplan.
Lichfields	3.27	Paragraph 3.8 goes onto state that; *the scale and comprehensive coverage of the land ownerships has the potential to facilitate a connected and integrated development across the SUE. It is essential to consider and coordinate all land ownerships as part of a comprehensive approach*. Whilst the Housebuilders appreciate the requirements of Policy SUE2 of the KLPCS in respect of comprehensive development, we would like to point out that it is possible to achieve the comprehensive development of a site	We disagree with the contention that comprehensive development can be delivered without coordination across land ownerships. We would particularly refer to the need for coordinated infrastructure provision, which necessarily involves physical connections between parcels in different ownerships. The masterplan content therefore remains relevant. As per earlier response, we are happy to delete references to options.	No	As above, removed references to options in masterplan.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		without coordinating across land ownerships. As such, we recommend the paragraph 3.8 is **deleted**. In paragraph 3.9 the reference to option agreements should also be **deleted**.			
Lichfields	3.28	Page 26 provides a summary of the SWOT analysis for the site. This should be reviewed and updated in accordance with our comments on Section 03. In addition, the Housebuilders have the following comments: 1 Strengths – Bullet 3 refers to consolidated land ownerships. The Housebuilders are unsure what this is referencing. 2 Threats – In respect of Bullet 1, Miller would like to clarify that the RSPCA are closing the premises irrespective of whether or not the development of Plot 5 proceeds. This is not a risk. Therefore, reference to them remaining at the current premises should be **deleted**. 3 Threats – Bullet 6 refers to the 132KV overhead cables on Plot 3. Redrow would like to clarify that this is subject to ongoing negotiations with Scottish Power. The issues are not necessarily just limited to cost. 4 Threats – Bullet 7 states that it is unlikely that the 36" mains pipe running through the FSA will be	Please see above which details which of the comments on section 3 have been accepted and addressed. Point 1: Consolidated land ownership reflects that large parcels of the site are in the control of single landowners. However we are happy to update this with clearer language, such as "large development parcels". Point 2: Agreed; the Masterplan reflects that this facility has now closed. Point 3: We are happy to include that this is also subject to agreement with Scottish Power. Point 4: We consider that this is appropriately identified as a threat, as the text goes on to clarify that the impact is limited to the FSA/NIA area.	No	Replace "consolidated land ownership" with "large development parcels". Remove reference to RSPCA not closing as a threat. Add "and agreement with Scottish Power" to the bullet about the diversion of the 132kv power line.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		diverted. Redrow can confirm that this cannot be diverted. However, it is not a threat to the development and can remain in situ within any adverse effect. Therefore, this point should be **deleted**			
	Policy Context (04)				
Lichfields	3.29	Section 04 of the draft Masterplan provides an overview of the relevant planning policy context for the site. We have not provided comments on this section. However, it should be reviewed in line with our wider comments set out within these representations.	Noted.	No	No
	Masterplan Framework (05)				
Lichfields	3.30	Paragraph 5.6 (page 38) states that; *the framework is a genuine blend of development principles and parameters that were considered to be the strongest and received most support during stakeholder engagement*. Whilst the Housebuilders were consulted on options and subsequently a preferred option of the Masterplan, this was simply a single plan. It was not the draft Masterplan document that is now the subject of consultation. We have not been consulted on many of the assumptions, parameters and requirements set out within Sections 05 and 06 of the draft Masterplan.	The housebuilders and other stakeholders were consulted on development principles and parameters. While we accept that the housebuilders were not consulted on the full detail of the draft Masterplan prior to the public consultation, we did hold a workshop in 2019 which covered the emerging design guidance, at which comments from housebuilders then shaped the content appearing in the consultation draft. Like all other stakeholders they were given the opportunity to submit comments during the public consultation period.	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
Lichfields	3.31	Furthermore, paragraph 5.7 goes on to state that deliverability has been considered when establishing the draft Masterplan Framework. However, it is our understanding that this is not in fact the case at this stage and that ongoing work is under way to consider the viability implications of the draft Masterplan. Therefore, it is recommended that a caveat is introduced on page 38 which states that parameters set out within the Masterplan Framework and the associated Design Guidance are indicative and that the proposals are subject to ongoing testing in respect of viability. It would be appropriate to add this to the red box.	We contend that some aspects of deliverability were considered in preparing the draft Masterplan, not least through the aforementioned engagement with housebuilders. We do however acknowledge that the Masterplan needs to be supported by robust evidence in relation to deliverability and viability. This work has now been finalised to support the final masterplan, with input from housebuilders and landowners.	No	Final masterplan includes content reflecting the final deliverability and viability evidence, see Implementation and Delivery section
Lichfields	3.32	Paragraph 5.8 (page 39) sets out the main characteristics of the 'preferred option'. Bullet 4 states that there will be a new bus route between Lower Road and Baileys Lane. However, this is subject to obtaining agreement from Mersey Travel and local operators. The word potential should therefore be added in front of the word new. This reflects the fact that the Masterplan seeks to be able to accommodate a bus route, not that the Housebuilders are required to divert an existing route or facilitate a new route.	With respect to bus service provision the physical road infrastructure and bus stops within the site will need to be provided by developers. Developers are also likely to need to provide funds towards a subsidised bus service, which including a related s106 requirement. Given this, we still consider that "bus route" is an appropriate description for the purpose of this section of the Masterplan. To add the word "potential" would weaken the Masterplan, implying that this is optional. It should be noted that	No	Final masterplan includes details of the requirements to implement a bus route including subsidy.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
			Merseytravel and bus operators are also an audience of the Masterplan.		
Lichfields	3.33	Bullet 5 goes on to state that there is potential to 'downgrade' Higher Road with landscape to existing central reservations. This comment is vague, and it is unclear what purpose this would serve. The Transport Assessment [TA] undertaken on behalf of our clients has not identified this is something that needs be provided as part of the proposals at East of Halewood.	This has been identified as a potential highway and place making intervention, to ensure that the nature of the stretch of Higher Road within the SUE site reflects the residential environment that will now enclose it. We acknowledge that further evidence is needed to support the identification of highways improvements, as well as details of the timing and method of their delivery. We continue to work towards finalising this evidence, on which we will be seeking further input from the housebuilders, and which will be available to support the final Masterplan.	No	Further details about highway improvements needed are included in the final Masterplan.
Lichfields	3.34	Figure 5.1 (page 39) is identified as the emerging preferred option plan. This plan is reduced in size and shrunk into the bottom part of the page making it difficult to see. It is suggested that the plan is presented on a full page. We have the following comments in respect of Figure 5.1: 1 There is no evidence to support the locations earmarked for 'potential junction improvements, footway	Point 1: We acknowledge that further evidence is needed to support the identification of highways improvements, as well as details of the timing and method of their delivery. However we don't consider that any change is needed to Figure 5.1 in this regard; this is a preferred option, which then informs the more detailed and refined Masterplan which follows.	No	The final masterplan provides further clarification as to the role and function of the NIA / FSA, particularly in terms of its POS function

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		improvements and pedestrian/cycle connections. Further commentary on these matters is provided between paragraphs 3.53-5.55 (potential junction improvements) and paragraphs 3.87-3.91 (dedicated pedestrian/cycle route). Figure 5.1 should be updated to reflect those comments. 2 Green hatching identifies land within the ownership of United Utilities which 'could be included for flood storage'. This is not required and should be removed from the key. The flood risk assessment & drainage strategy and associated hydraulic modelling for Plot 1 establishes that no further land is required for the FSA. 3 There is an area located to the west of the FSA/NIA identified as 'Open Greenspace'. This is a crucial area within the FSA and making it publicly accessible would compromise its ability to function. This should therefore be removed.	Point 2: We consider that this point is more appropriately addressed within the main Masterplan, rather than this preferred option presentation. Point 3: As previously noted, we acknowledge that the Masterplan needs to provide further clarification as to the role and function of the NIA / FSA, particularly in terms of its POS function. Again, we don't consider it appropriate to update the preferred option presentation in this regard.		
Lichfields	3.35	In a general sense, there are numerous figures provided throughout Section 05 identified as 'framework plans'. These plans generally make assumptions that are yet to be verified as deliverable or agreed with the Housebuilders. As such, the titles should be amended on all	We do not agree that "indicative" would be an appropriate or helpful addition here, as it would weaken the function and application of the Masterplan. With respect to the plans, there is no	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		figures to state that they are '***indicative***'	requirement that they be "agreed" with the housebuilders in advance of the masterplan being finalised.		
	Land Use and Amount (05a)				
Lichfields	3.36	A Framework Plan is located at Figure 5.3 (page 41) which seeks to establish the fundamental structuring principles and spatial components of future development. The Housebuilders have the following comments in relation to Figure 5.1: 1 The text in the key associated with the tear drop on Plot 5 should remove reference to SUDS, simply stating pumping station. Technical evidence has been provided and accepted to demonstrate that SUDS are not deliverable on Plot 5. 2 The word 'possible' should be introduced in respect of the alignment of the proposed bus route. 3 There is no evidence to suggest that improvements are required to a section of the Finch Lane carriageway (symbolised by a 2) and therefore this should be **deleted**. 4 The Housebuilders can demonstrate that improvements are not required at a number of locations identified for potential	Point 1: We are working with Miller Homes to fully investigate options for surface water drainage, and particularly to ensure there is sufficient technical evidence, that is agreed with the LLFA and UU, to justify the use of a pumping station here, if appropriate. Point 2: As per earlier comments, we do not agree that "possible" or "potential" would be a useful addition here. Please see earlier response in relation to the proposed bus route. Point 3/4: As previously noted, we acknowledge the further evidence needed to support the identification of highways improvements. Point 5: The dedicated pedestrian and cycling route is a key structuring principle of the Masterplan, and is essential to ensuring ease of access to sustainable transport routes throughout the whole site. Notwithstanding this, we have agreed to some limited rationalisation of the route. We have responded to later	No	Retained flexibility for drainage solution for the Miller parcel in the final masterplan. Further details about highway improvements needed are included in the final Masterplan Final Masterplan included rationalised and updated cycle route. The final masterplan provides further clarification as to the role and function of the NIA / FSA, particularly in terms of its POS function.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		junction improvements and upgrades to pedestrian footways/crossing points. This matter is addressed fully in our comments to Section 05e of the draft Masterplan and within the supporting technical note prepared by Curtins (enclosed at Appendix 1). Once the evidence base has been agreed between the parties the entire document should be updated to reflect the agreed position, including figures 5.1 and 5.3. 5 In respect of dedicated pedestrian/cycle route running through the site, it is unclear why this is required, or at least why it is necessary in certain locations. The requirements set out in Section 06c relating to road design require all primary streets to include 3m footways to accommodate pedestrians and cyclists. This clearly constitutes designation as a dedicated pedestrian/cycle route in accordance with Manual for Street Guidance. Therefore, it is unclear why a separate parallel route is required, for example on Plot 3. It is unclear what additional purpose this would serve if the primary street is already going to accommodate a dedicated pedestrian/cycle route	detailed comments on this matter. Point 6: As previously noted, we acknowledge that the Masterplan needs to provide further clarification as to the role and function of the NIA / FSA, particularly in terms of its POS function. We do not consider it appropriate to retrospectively make amends to the preferred option diagram.		

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		through a wide identified corridor on the potential bus route plans. This matter is addressed further in our response to Section 05e of the draft Masterplan. 6 The Housebuilders support the removal of amenity greenspace on the FSA on figure 5.3. Figure 5.1 needs to be updated accordingly.			
Lichfields	3.37	Table 5.1 goes on to set out a table containing text-based comments on land use and amount. Row 1, Column 3 (page 43) states that the; *use of developable area may be required to facilitate the improvements of existing junctions and highways as well as facilitating new means of access onto the highway network.* The Housebuilders have provided evidence demonstrating that identified highways interventions can all be delivered within the adopted highway (as addressed in Curtins technical note at Appendix 1). As such, this comment should be **deleted**.	As previously noted, we acknowledge the further evidence needed to support the identification of highways improvements,	No	Further details about highway improvements needed are included in the final Masterplan.
Lichfields	3.38	In respect of Row 2, Column 3 (page 43), the Housebuilders seek clarity on how the approximate development amount of 23 ha for green infrastructure and POS has been calculated. It is not apparent from the Masterplan or SPD. Whilst the Council has published	The Masterplan includes further detail of the POS quanta sought for the site. As we have previously noted, the final Masterplan needs to provide further clarification as to the role and function of the NIA / FSA, particularly in terms of its POS	No	The final masterplan provides further clarification as to the role and function of the NIA / FSA, particularly in terms of its POS function

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		standards in the KLPCS and the Developer Contributions SPD it is not clear how these have been used to calculate the POS requirements set out within the Masterplan This figure should not include the land associated with the FSA/NIA.	function.		
	Residential development (05b)				
Lichfields	3.39	Key guidance on residential development is provided on pages 44 and 45. Paragraph 5.15 states that "*development will include appropriate provisions for education and healthcare to support a sustainable community"*. This sentence seems to suggest that education and healthcare provisions will be made on site. Whilst the Housebuilders are awaiting additional information in respect of education and healthcare provision, we understand that there is no requirement to provide such facilities on site. Indeed, this is the only part of the draft Masterplan that alludes to provision being made on site. Discussions have taken place between the Housebuilders and the Council on the basis that provisions for education and healthcare will be secured by way of off- site financial contributions. Therefore, the sentence should be **deleted or reworded**.	We consider that the reference in this paragraph to the detail later in the masterplan document provides sufficient clarification, however we are happy to provide further clarity in this paragraph to ensure that the Council's position of requiring off site contributions to this infrastructure is abundantly clear throughout the document.	No	Change "provisions" to "contributions"
Lichfields	3.40	Specific commentary on housing mix is	While we consider that the East of	No	Remove "fully" from 5.19

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		provided on page 45. Paragraph 5.17 states that a range and mix of house types will be provided in accordance with the KLPCS requirement to rebalance the wider Knowsley Borough housing market. Paragraph 5.18 goes on to state that a focus on providing larger family homes will be welcomed in order to assist with the rebalancing. Whilst the Housebuilders support this approach, the text here could be expanded here to clarify that the development at East Halewood will be unique for the borough and not fully reflect the existing character of Halewood. It is also recommended that the word fully is **deleted** from the first sentence of paragraph 5.19.	Halewood site is of strategic importance to the Borough, we do not see the benefit of describing it as "unique" here. There is no suggestion that the new development will need to fully reflect the existing character of Halewood, so we are unsure why this is being suggested. Agreed "fully" can be removed from 5.19.		
	3.41	Commentary on affordable housing provisions is provided between paragraphs 5.20 and 5.23. The Housebuilders acknowledge the requirement to provide 25% affordable housing in accordance with Policy CS15 of the KLPCS unless it can be clearly demonstrated that achieving the policy requirement would render the scheme unviable. This is stated at paragraph 5.19 but a caveat should also be introduced at paragraph 5.20 making it clear that what is stated is subject to viability. The Housebuilders welcome the fact that the affordable housing	We consider that the position on provision of affordable housing being subject to viability is sufficiently clear. However, we can add a further "in accordance with this policy" to the beginning to make sure this is absolutely clear. As noted previously, we are happy to engage further with the housebuilders on affordable housing provision.	No	Add "in accordance with this policy" to the beginning of section

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		provisions set out in Table 5.2 are marked as indicative and would reiterate that ultimately the type and tenure of the affordable housing provision should be supported by evidence from Registered Providers. We understand that the Council will be providing further information on affordable housing in due course and we will comment further at that time.			
Lichfields	3.42	Whilst the Housebuilders preference is to provide a policy compliant level of affordable housing, there are proposals set out within the draft Masterplan that will potentially have significant implications on the costs associated with delivering the scheme. We understand that the implications of the draft Masterplan on viability are currently being reviewed by Keppie Massie and we await further details. We will therefore comment on this matter further in due course.	We welcome the intention to provide policy compliant schemes with respect to affordable housing. Housebuilders will also be aware that, notwithstanding the final Masterplan, there remains the option through the planning process to submit viability evidence alongside planning applications.	No	No
	Green Infrastructure (05c)				
Lichfields	3.43	Section 05c relates to the provision of green infrastructure. Key guidance is provided within a green box on page 48 where it is stated that the development will provide new POS in the form of parks and gardens. Whilst private gardens will be provided for dwellings, the draft Masterplan does not suggest	"Parks and Gardens" refers to a typology of POS within the Council's Developer Contributions SPD. We anticipate that much of the Finch Woods area will meet the requirements for this typology, and also provide space for other typologies including Children and	No	Further clarifications on the delivery of key POS is provided in the final Masterplan.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		that a new public garden should be provided anywhere on the site. It has been established that the majority of POS will be provided at Finch Woods, a Council owned site that adjoins Plots 3 and 4. We understand that the Council are currently developing proposals for the site and the Housebuilders will comment on those detailed proposals in due course when they are available. It is our understanding that financial contributions will be sought from the Housebuilders by way of commuted sums in order to deliver the improvements to Finch Woods. Therefore, the key guidance in respect of green infrastructure should be updated to clarify that parks, gardens, allotments and amenity green space could be provided in Finch Woods.	Young People and Allotments. This is shown on Figure 5.7. We do not consider that this is any benefit to providing further detail on this in the "key guidance" box. We are committed to working with the housebuilders to finalise the delivery mechanisms for key open spaces including Finch Woods, including developer contributions.		
Lichfields	3.44	The key guidance box also states that outdoor sports provisions will be provided on the site. This is contrary to the adjacent Figure 5.7 (page 49) which does not identify any on site sports provision. Furthermore, there is no evidence to suggest there is a requirement to make provision for new sports facilities as part of this development. The site is already served by facilities at the Halewood Leisure Centre and new public sports pitches are to be provided at EFC's training	We don't consider that the key guidance box implies that outdoor sports provision will need to be provided on site – it says "Development… will provide..." such spaces. As clearly set out in the delivery section the Masterplan, we expect that these will be provided off site through investment in facilities at Halewood Leisure Centre. We acknowledge the need to provide a robust case of the developer contributions to be sought here,	No	Clarification on the role of EFC pitches and the outdoor sports requirement (through developer contributions) have been provided in the final Masterplan.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		facility. We will comment on this matter further in due course when the Council has published the forthcoming evidence base around proposed financial contributions.	including understanding the public accessibility of the EFC pitches – though our understanding is that there will be no public access to this facility.		
Lichfields	3.45	In relation to paragraph 5.41 (bullet 3), the word potential should be added before wetland ponds and swales as it is yet to be established if this can be delivered.	We accept that the spatial prescription of the location of these facilities is not necessary within framework plans; however we consider that identifying potential locations, and the specification for such facilities should they be included, will be helpful.	No	Final masterplan provides guidance on the inclusion of ponds and swales but does not prescribe spatial locations for their use.
Lichfields	3.46	At paragraph 5.45 (page 50) it is suggested in the first sentence that when the loss of hedgerows is unavoidable they will be transplanted within the site where possible. This is not practical solution and should be **deleted**. The Housebuilders will provide compensatory planting in accordance with the second sentence.	We now understand that it will not be possible to transplant hedges within the site, hence the final masterplan refers to replacement or compensatory planting.	No	Final masterplan removes reference to transplanting hedgerows, but includes reference to compensatory planting.
Lichfields	3.47	At paragraph 5.47 (bullet 2) it is stated that upgrades will be made to the existing public right of way [PROW] running through the site between Finch Woods and Finch Lane. It is however not specified here, or anywhere else in the document what upgrades are proposed or are considered reasonable and necessary to make this	Retention of the PROW is required, and is identified early in the Masterplan as an opportunity for an upgraded green corridor. The final Masterplan provides further clarification about the specification required here.	No	Final masterplan provides detailed about the required upgrades to the PROW route (for example, widening, resurfacing, lighting)

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		development acceptable.			
Lichfields	3.48	In relation to the commentary on SUDS at paragraphs 5.49-5.53 (page 51), the Housebuilders have submitted detailed drainage strategies to the Council demonstrating that all attenuation can be provided in ponds. There are no proposals to incorporate swales and the Housebuilders do not consider their inclusion is justified. Therefore, it is recommended that the first sentence of paragraph 5.52 is amended to state; ***it is anticipated that swales could potentially be integrated into the development if it is established that they are necessary for site attenuation***.	We accept that the spatial prescription of the location of these facilities is not necessary within framework plans; however we consider that identifying potential locations, and the specification for such facilities should they be included, will be helpful. The final masterplan reflects this approach.	No	The final masterplan provides guidance on the inclusion of ponds and swales but does not prescribe spatial locations for their use.
Lichfields	3.49	In respect of the commentary on ecology (page 52), the Housebuilders support the use of the FSA as a NIA and would like to reiterate that this area cannot be used for POS as discussed in the more detail below (§3.50-§3.51).	As we have previously noted, the Masterplan needs to provide further clarification as to the role and function of the NIA / FSA, particularly in terms of its POS function.	No	The final masterplan provides further clarification as to the role and function of the NIA / FSA, particularly in terms of its POS function
	Open Space Requirements (05d)				
Lichfields	3.50	Paragraph 5.58 (page 54) and the adjacent Figure 5.9 (page 55) identifies the FSA/NIA as 'Tier 2' strategic open space. Redrow strongly object to this and request that reference to the FSA/NIA as POS is removed throughout	As we have previously noted, the Masterplan needs to provide further clarification as to the role and function of the NIA / FSA, particularly in terms of its POS function. We have engaged with the housebuilders, as	No	The final Masterplan provides further clarification about the use of this space.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		the document. Providing functional POS within the FSA would constrain its ability to function. Furthermore, this would also have negative implications on the area's dual function as a NIA. For example, there is an opportunity for the area to attract nesting lapwing and potentially skylark if in a suitable condition. This value will be eroded or unachievable if the site is publicly accessible. It is unclear if the Council has discussed the use of this area for POS with the environment agency and the Housebuilders would welcome their comments on this matter. The draft Masterplan should be updated to clarify that the FSA/NIA will not be publicly accessible.	well as the EA, UU and other partners on this matter. We do however anticipate that there will be opportunity to provide some public accessibility without inhibiting the maintenance functions of the space for flood risk mitigation and ecological mitigation. We consider there are advantages to facilitating such access, in comparison to fencing the area off to prevent public access altogether.		
Lichfields	3.51	In respect of Table 5.4 (page 59), it is stated in the FSA column that there is potential to expand the FSA to the east into land owned by United Utilities [UU]. On behalf of our clients, Waterco have undertaken a detailed Hydraulic Modelling exercise that demonstrates that the FSA functions as proposed, ensuring that the site is not at risk from flooding. As such, there is no technical reason that would require the FSA to be extended into the UU land and this comment should therefore be **deleted**.	This is noted, our understanding is that the UU land will not be developed, nor will it form part of the Flood Storage Area necessary to facilitate the development of the wider northern parcel. The FSA designation has therefore been removed from this site.	No	The final Masterplan removes the FSA designation from the UU land.
Lichfields	3.52	We understand that the Council will be	Noted.	No	Further information in

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		providing further information in respect of POS requirements and we will provide full comments in due course once the evidence base to support the content of the draft Masterplan has been provided.			respect of POS requirements is included within the final masterplan
	Access, movement and off site highway improvements (05e)				
Lichfields	3.53	Key guidance in respect of highways matters is provided on page 60. An access and movement framework plan is provided at Figure 5.11 on the adjacent page (page 61). The plan (and associated text) identifies a number of potential locations for junction improvements that the Housebuilders do not support as our evidence suggests that they are not necessary. This evidence is presented in a Masterplan Review Transport Note prepared by Curtins (enclosed at Appendix 1). The note reviews the proposals set out within Section 05e, and in particular considers the areas identified on Figure 5.11 as locations for 'potential junction improvements'. Clear evidence is provided which demonstrates where improvements and interventions are necessary and where they are not.	We note the provision of the Curtins note in this regard however in the absence of robust information being provided to date, we acknowledged that further evidence was needed to support the identification of highways improvements. This is reflected in the final masterplan.	No	Further details about highway improvements needed are included in the final Masterplan.
Lichfields	3.54	The scope and nature of highways interventions is a matter that is subject to ongoing discussions and negotiations, and that in the absence of the agreed position, the Council have identified a	As above	No	As above

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		range of locations where improvements could be made. However, the proposals currently identified within the draft Masterplan do not, at this stage have any evidential basis and therefore could potentially appear as misleading to members of the public. It is important to note that the evidence base Options Testing and Baseline Reports provide no evidence to support the proposed locations for interventions.			
Lichfields	3.55	On this basis, the title of the access and movement framework plan should be updated to 'indicative access and movement framework plan'. In addition, a caveat should be introduced into the key guidance box on page 60 stating that the assumptions made in respect of Section 05e are indicative at this time and will be verified and agreed in due course. The Housebuilders welcome ongoing discussions with the Council in respect of highways matters and urge that the fact these matters are largely yet to be revolved is reflected correctly within the draft Masterplan at this stage.	We disagree that this change is needed, as the final Masterplan content is supported by evidence.	No	As above
	Utilities and services (05f)				
Lichfields	3.56	Key guidance in respect of utilities and services is provided on page 68 and a utilities and services framework plan is provided at Figure 5.13 on page 69. In respect of Figure 5.13, as per our	We are working with Miller Homes to fully investigate options for surface water drainage, and particularly to ensure there is sufficient technical evidence, that is agreed with the	No	Retained flexibility for drainage solution for the Miller parcel in the final masterplan.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		previous comments, the reference to SUDS should be removed from the key in respect of the rain drop symbolising the potential location for a pumping station on Plot 5.	LLFA and UU, to justify the use of a pumping station here, if appropriate.		
Lichfields	3.57	There is an existing substation identified on the key associated with Figure 5.13 as 'existing substation to be located within proposed developable area'. The sub-station is located adjacent to Bellway's land at Plot 2 at the junction of Greensbridge Lane and Lower Road. The freehold of the substation and associated land is owned by Scottish Power (formerly Manweb plc). The draft Masterplan contends that the substation is located in a prominent location and that there would be a significant improvement to the townscape were it to be relocated. There is no evidence that there is an operational reason to move it, nor even that Scottish Power or United Utilities are willing to agree to its move.	The relocation of the substation is required for a number of valid reasons including visual impact and highways safety; it is simply not acceptable for this facility to remain in situ. This location is one of the most prominent gateways to the East of Halewood site and requires careful consideration, particularly for those developing the land immediately adjacent to it. Through initial dialogue, Scottish Power confirmed to the Council hat the substation could in fact be moved and relocated within the development area, albeit this would attract a cost. This matter requires further discussion with Scottish Power, but the Council is content that there is sufficient justification to require the relocation of the substation.	No	No
Lichfields	3.58	There are further references to this substation throughout the document in the following locations: 1 Figure 3.2 (page 16) the substation is identified as a constraint;	We acknowledge that the draft Masterplan's references to the substation are inconsistent and require review to ensure consistency throughout the document.	No	Final masterplan references to the substation are consistent.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		2 Table 3.1 (page 17) under the heading utilities (7th bullet) the issues around the substation are identified; 3 Table 3.2 (page 21) under the heading utilities (3rd bullet) it states that ongoing discussions are underway with utilities providers to relocate the substation to a more suitable location; 4 Table 3.3 (page 24) on the fifth line it identifies the Scottish Power ownership and indicates that "Bellway to acquire"; 5 Figure 3.4 (page 25) the Scottish Power ownership is referred to as "Manweb PLC"; 6 Figure 5.13 (page 69) the substation is identified as 'existing substation to be relocated within proposed developable area'; 7 Table 5.6 (page 70) under the electrical substation heading (8th row) it is stated that the substation is to be relocated to a less visually prominent location; 8 §5.117 - 5.119 (page 71) it is stated that development proposals should seek to relocate the existing substation to help improve its efficiency and ensure it is effectively and sensitively screened from view; 9 §6.27 (page 81) under subheading 2 it is stated that the relocation of			

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		the substation from this visually prominent location creates an opportunity to visually and physically connect the site back to the existing urban context; 10 Figure 6.57 (page 180) the site of the substation is shown as play space and the text below states that the substation is removed from its visually prominent position and replaced by open views into the site; 11 Table 7.1 (page 194/195) under the utilities – electricity section (6th row) it is stated that the relocation of the existing substation is required and that developers are obliged to relocate existing substation; 12 Table 7.2 (page 200) the following is stated: a. Bellway to work with Scottish Power to relocate substation to optimum location. b. Bellway to acquire the substation site from Scottish Power (Manweb Plc). c. Bellway to relocate substation and that the existing substation land should be incorporated into their development parcel.			
Lichfields	3.59	Taken together the draft Masterplan appears to impose a requirement upon the developer of Plot 2 (Bellway) to	As noted above, the relocation of the substation is required for a number of valid reasons including visual impact	No	Final masterplan sets out a consistent approach to substation

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		relocate an operational sub-station, notwithstanding: 1 There is no technical evidence to demonstrate that this is achievable; 2 Despite the unsubstantiated reference to "efficiency" there is no technical evidence to demonstrate that any operational benefits would arise from the relocation; 3 Any visual intrusion caused by the sub-station is an existing issue which is not worsened by the proposed development; 4 Whilst 'initial' or 'ongoing' discussions have taken place with Scottish Power (depending upon different parts of the Masterplan) there is no evidence that it would actually consent to the relocation of this substation; 5 There is no costing of the relocation of this significant piece of infrastructure; 6 Relocation of the substation was not assessed in the infrastructure delivery plan of the Core Strategy, nor was its cost assessed as part of the viability appraisal of the plan; 7 The requirement to move the substation only arises from the draft masterplan which is not policy. No such policy requirement arises from the policies of the core strategy nor	and highways safety, including the works necessary to the Lower Road / Greensbridge Lane junction; it is simply not acceptable for this facility to remain in situ. Again as noted above, through initial dialogue, Scottish Power confirmed to the Council that the substation could in fact be moved and relocated within the development area, albeit this would attract a cost. This matter requires further discussion with Scottish Power. We are happy to acknowledge that there would be some cost in relocating the substation, which is included in the viability work completed by Keppie Massie to support the final masterplan. There is no suggestion that CPO of the substation is necessary. It would not be appropriate for a Core Strategy to consider detailed matters such as the relocation of a substation.		relocation, agreed with Scottish Power and accounted for within the viability work supporting the masterplan.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		even the draft SPD; 8 There has been no resolution on the part of the LPA to evince an intention to promote compulsory acquisition of the sub-station if Scottish Power indicate a willingness to agree to its removal and re-provision elsewhere.			
Lichfields	3.60 and 3.61	It is Bellway's view that the draft Masterplan appears to be under the mis-apprehension that its role is to identify all of those things within the area of consideration which would result in an improvement of the area. It is however our contention that this misses entirely the point that the Masterplan which has a very particular role, which is to namely fulfil the requirements of Policy SUE2 of the KLPCS: *3. For each of the locations referred to in Policies SUE2a to SUE2c), the Council **will prepare a Supplementary Planning Document, which will provide a proposed spatial development framework** for the site together with further details of development and infrastructure requirements.* *4. Proposals for development within each of these locations will only be granted planning permission where they are consistent with a single*	For the reasons set out above, we strongly disagree with this contention. The relocation of the substation is required for a number of valid reasons including visual impact and highways safety; it is simply not acceptable for this facility to remain in situ. We consider that our position on this matter is consistent with our Local Plan policy, being a constituent element of a detailed masterplan for the site. We consider that the relocation of the substation is required to make the development of East of Halewood acceptable, in terms of visual impact and highways safety.	No	As above

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		detailed master plan for the whole of the Sustainable Urban Extension which is approved by the Council. ***The master plan should accord with development plan policy and any associated Supplementary Planning Document and may be submitted prior to or with the application. Planning permissions must be linked to*** *any necessary legal agreements for the improvement, provision, management and maintenance of infrastructure, services and facilities, open spaces and* ***other matters necessary to make the development acceptable*** *and which facilitate comprehensive delivery of all phases of development within the Sustainable Urban Extension in accordance with the single detailed master plan.* The key point here is that Policy SUE2 of the KLPCS only imposes requirements relating to the provision of infrastructure if it is deemed to be necessary to make the development acceptable and there is no evidence to suggest that the relocation of the existing substation is in fact necessary to make this development acceptable. As such, the draft Masterplan is currently at odds with the KLPCS in			

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		relation to this matter.			
Lichfields	3.62	Notwithstanding this, Bellway does acknowledge that the relocation of the substation would comprise an understandable objective to improve the existing townscape and if a planning application were to deliver such a relocation, then there would be a significant benefit to the scheme which would be weighed in the planning balance in favour of the proposals. However, where the draft Masterplan has fallen into serious error is to purport to make the relocation of the substation a mandatory requirement for the delivery of Plot 2, when that is unsupported by Policy SUE2 of the KLPCS and also the draft SPD.	Given Bellway's position here, we consider that there is some collective agreement that the moving of the substation would be a benefit. As noted above, we consider there is justification to require its removal, it is required to make development acceptable, and the requirement to do so constitutes reasonable content for the Masterplan.	No	As above
Lichfields	3.63	Whilst not reflected in the draft Masterplan, comments were previously made to the effect that the substation constrains visibility on the approach southwards towards the Lower Road/Greensbridge Lane junction. Curtins have undertaken a review of the visibility at this junction in order to provide comfort that the visibility at this junction meets Manual for Streets standards. As a 30mph Road, the visibility is required to reach 43m from a 2.4m set back from the stop line. The visibility splay can be offset into the	Manual for Streets advises itself that it focuses on lightly-trafficked residential streets, but many of its key principles may be applicable to other types of street, for example high streets and lightly-trafficked lanes in rural areas. Greensbridge Lane, a classified B road, does not fall into any of this criteria and again MfS advises that it is the responsibility of users of MfS to ensure that its application to the design of streets not specifically	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		carriageway by 600mm from the kerb if this is required. Curtins have prepared a visibility plan (enclosed within their technical note at Appendix 1) which clearly demonstrates that visibility accords with the Manual for Streets guidelines. As such, there are no highways safety grounds to support the relocation of the substation.	covered is appropriate. We do not consider its applications appropriate to these circumstances. We maintain that there are appropriate highway safety grounds to require the removal of the substation from this location.		
Lichfields	3.64	On the basis of the above, the draft Masterplan should be amended to reflect the fact that the relocation of the substation is a potential opportunity which could be explored further and which, if delivered would comprise a land use benefit of the scheme. The relocation cannot however be an explicit requirement for the delivery of Plot 2 as is currently proposed. Bellway would be happy to discuss the matter with the Council further and agree an approach to how the matter should be addressed within the document.	For the reasons set out above, we disagree with this.	No	No
Lichfields	3.65	At paragraph 5.110 it is stated that; *a coordinated utilities strategy across all land parcels will be required in order to deliver a new residential neighbourhood which is sustainable and comprehensive*. This statement has however had no regard to the deliverability of the site and the constraints that exist in respect of land	We consider that a coordinated utilities strategy will be of significant benefit and that there will be efficiencies associated with housebuilders working together on utilities provision. It should be noted that this covers more than just surface water drainage – it also covers electricity, gas, water supply,	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		ownerships. Whilst it is acknowledged that this is not in its self a planning matter, regard must be had to the reality of the situation and the implications that multi-parcel reliance could have on the overall deliverability of the site. For example, should a particular plot rely on another for drainage purposes, in the event that the development of that plot was delayed, the other plot would become undeliverable. The key guidance box on page 68 states that; *…applicants will be required to demonstrate and ensure that development of individual land parcels will not sterilise the ability to bring forward other land within the site*. This statement directly conflicts with other comments around providing a coordinated utilities strategy across all land parcels because, as set out above, this removes specific plots ability to come forwards if another does not. It is therefore recommended that references to; *a coordinated utilities strategy across all land parcels* are **deleted** from the document. In order to ensure the site remains deliverable, each parcel will be self-sufficient in respect of matters relating to drainage. This does not prevent the development of the site being comprehensive or sustainable but ensures that it is deliverable.	waste water drainage and digital infrastructure. Indeed, we understand it is the intention of the housebuilders to jointly commission some of these services for the parcels in their control. Our main concern is that a piecemeal approach to utilities could put at risk the delivery of the wider site – for example, where reinforcement is required to facilitate the whole site being delivered, this is recognised and planned for up front, rather than a later phase developer having to bear the cost of significant upgrades. We have keen regard for the deliverability of the site and the constraints of land ownership. Indeed, we have already tried to accommodate the housebuilders' aspirations for surface water drainage solutions, responding to the reality that a linked and dependent approach would result in some parcels being delayed, while drainage infrastructure is put in place in other parcels; we consider a pragmatic approach has been agreed here. We don't consider that there is any conflict between the key guidance		

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
			and the preference for a coordinated utilities strategy.		
Lichfields	3.66	In respect of the section of 132Kva cable running through Plot 3, the key associated with Figure 5.13 identifies the cable as; *overhead section of 132Kva cable to be under-grounded within Finch Lane*. The way this is written assumes that this is a definitive outcome. However, this matter is subject to an ongoing negotiation between Redrow and Scottish Power and it has yet to be established if the 132Kva cable should be diverted or under grounded. As such, the wording should be updated to state; *overhead section of 132Kva cable to* ***potentially*** *be under- grounded within Finch Lane*.	Our understanding is that the proposed solution is technically possible, and desired by all parties. We do consider that the undergrounding of the cable is a necessary solution to ensure comprehensive development of the East of Halewood site. To include the word "potentially" would be to weaken our position on this matter, to the detriment of all. As the details of the final undergrounding scheme are not yet available, the wording can be changed to reflect that the undergrounding could be within the site itself – or indeed within Finch Lane. This would not weaken the case for the undergrounding over all.	No	Final masterplan reflects that exact alignment scheme has not yet been finalised, allowing for flexibility for the technical delivery solution.
Lichfields	3.67	In respect of the utilities considerations set out in Table 5.6 (page 70), the Housebuilders would welcome confirmation on where the specified easements have come from and if they have been agreed with utilities providers. For example, has the 4.0 metre stand-off specified in respect of the pressurised 36" trunk main been formalised with UU. This is not apparent from the Masterplan or the supporting documentation.	This is noted, the final Masterplan will provide clarification of the source of the prescribed easements.	No	Final masterplan includes clarifications on source of utilities easements

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	Design Guidance (06)				
Lichfields	3.68 and 3.69	Section 06 of the draft Masterplan sets out detailed design guidance in respect of the wider East Halewood SUE. It is envisaged that the design guidance will complement the Masterplan Framework set out in Section 05. Firstly, the Housebuilders welcome the acknowledgment on page 72 (within the red box) that Section 06 does not set fixed design parameters. However, notwithstanding this, it is important to note from the offset that the Housebuilders strongly object to Section 06 of the draft Masterplan in its current form. The document provides significant detailed design guidance that we consider to be both prescriptive and restrictive. It is our contention that the level of detail to which Section 06 goes to is significantly beyond the realms of what is reasonable or appropriate for a Masterplan to serve its intended purpose.	We disagree with this comment. For a site of the scale of East of Halewood, it is beneficial to have in place design guidance that will deliver consistency and quality within the new development. This should be a helpful tool for all developers, giving practical and helpful guidance in order that they can deliver the high quality development sought by the Council's policy framework for this important site. This approach aligns with best practice in planning for large residential developments. We have been clear that this part of the masterplan document does not set fixed parameters, but rather sets out a flexible code which developers should respond to through planning applications. Therefore we do not consider that is it is prescriptive or restrictive. The final masterplan document will make this position absolutely clear, and will ensure that the introduction to the design guidance section sets out how the guidance should be applied in the planning application process.	No	Final masterplan includes further guidance about the use of section 6. We have also added in cross references to the National design Guide 2019.
Lichfields	3.70 and	In this regard, please refer to our previous comments in respect of the	As per the above response, we welcome that the housebuilders	No	To reflect the final deliverability and

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	3.71	purpose of the draft Masterplan. Primarily, the Masterplan should accord with the SPD, which has the role of setting the spatial development framework for the SUE. The Masterplan must then: - Be consistent with the SPD; - Accord with the policy of the development plan; and, - Identify those matters which are necessary to make the development acceptable. It is the Housebuilders contention that Section 06 of the draft Masterplan what is reasonably required to fulfil the role of the Masterplan as required by planning policy. Nevertheless, we appreciate that it is beneficial to provide design guidance to ensure that there is a consistent approach taken to development. We simply object to the level of detail set out within Section 06 as its application has potentially significant implications on the viability of the scheme. We understand that Keppie Massie are currently reviewing these implications and we will comment on this matter further once their output from this exercise has been made available to us. The Housebuilders would welcome a seat at the table with all further discussions with Keppie Massie in	acknowledge the benefits of design guidance to ensure a consistent approach across this large site. As part of their work on reviewing the viability of the East of Halewood masterplan, Keppie Massie's approach to costing the scheme has referred to the design guidance section.		viability evidence, as necessary, including within the Implementation and Delivery section.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		relation to viability matters.			
Lichfields	3.72	The prescriptive and detailed nature of the design guidance is likely to have implications that will add significant abnormal costs to the scheme above and beyond what is necessary to make the development acceptable. It is important to note that any abnormal costs associated with the delivery of prescriptive measures set out within Section 06 of the draft Masterplan will lead to knock on implications on other parts of the scheme, for example, its ability to deliver a policy compliant level of affordable housing. This is not a route the Housebuilders wish to go down, but this will need to be reviewed once the outcome of the Keppie Massie review is known and the Housebuilders have had an opportunity to test this themselves.	Please see above response. We note the housebuilders' concerns here. The Keppie Massie viability work provides assurances in this regard.	No	No
Lichfields	3.73	In order to make it clear that further work is underway to establish the implications of the design guide on viability, it is recommended that the final sentence within the red box on page 72 is updated to state; ***Chapter 6 does not set fixed design parameters for the site but rather provides indicative guidelines that could potentially be incorporated into the scheme, subject to further testing in respect of the implications***	We do not consider that this change will be necessary, as the Keppie Massie viability work is available to support the final masterplan.	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		on viability.			
Lichfields	3.74 and 3.75	As a general comment, it is recommended that the text within the design guide is updated to make it clear that proposals are 'indicative' or could be delivered 'potentially'. We have not identified every single example but ask that the entirety of Section 06 is updated on this basis. The following sections provide commentary on each section of the design guide.	We are happy to agree to review the language in section 6 for consistency, however we do consider that the caveats at the introduction to the section set out clearly the nature of the content in this section.	No	Final review of language in section 6 completed, to ensure internal consistency. Added content to the introduction to make purpose of the section clear.
	Character Areas (06a)				
Lichfields	3.76	The Housebuilders generally support the use of character areas within the site and it has been long established that the provision of lower densities (25-30 dwellings per hectare [dph]) to the east of the site within the Country Edge area and medium densities (30-35 dph) elsewhere is supported. There is an inconsistency between bullet 1 of paragraph 6.9 and bullet 3 of paragraph 6.14 where densities of circa. 30-35 dph are referred to as medium and then high. This should be medium in both instances with bullet 3 of paragraph 6.14 updated. It is expected however that the required road widths	Agree that consistency is needed between the bullets noted – densities between 30-40 dph will be referred to as "medium".	No	Bullets describing densities use consistent terminology within the final masterplan document.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		and specification will have a detrimental effect on the deliverability of higher density areas.			
	Urban design Framework (06b)				
Lichfields	3.77	Section 06b sets out an urban design framework for the site. An urban design framework plan is provided at Figure 6.4 (page 79). The plan identifies certain areas within the site which are defined as significant arrival gateways, location of landmark buildings or internal nodes. The Housebuilders recognise the importance of key gateways within the site and do not have any significant objections in respect of the proposed 'significant arrival gateways' at the proposed site entrances. However, the proposals for a significant arrival gateway located on the junction of Greensbridge Lane / Lower Road should be considered in the context of our previous comments relating to the existing substation set out between paragraphs 3.47 and 3.52. It cannot be assumed that the substation can be relocated as part of the proposals.	Noted. Please refer to earlier response with respect to the substation. We consider that the identification of the Greensbridge / Lower Road junction as a key arrival gateway, with a key view into the site also in this location, supports the argument for the relocation of the substation.	No	No
Lichfields	3.78	Figure 6.4 identifies a number of locations where outward facing development should be provided, notably along the eastern boundary of the southern parcel which fronts	We acknowledge the housebuilders' wish for more flexibility for the expanded use of private drives across the site, however we do consider that a proportionate	No	Additional precedent imagery included in the final masterplan.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		towards the open countryside. The Housebuilders do not object to this on the basis that private drives are allowed in the outwards facing locations. However, the access and movement framework plan (Figure 5.11, page 61) only identifies small stretches of the eastern boundary as locations where private drives could be incorporated. This should be revisited to allow for a greater provision of private drives along the eastern boundary.	approach has been taken in the masterplan – whereby 3 properties or 25m maximum length facilities are prescribed. We will provide precedent imagery in the final masterplan which shows how this approach can work successfully. We believe that other lower order highway typologies, such as the Lane, can be deployed in these locations. Further comments in response to this issue are provided later.		
Lichfields	3.79	In terms of point 4 of paragraph 6.28 (page 81), it is unclear what is meant by a SUDS landscape in the first sentence. In terms of landmark buildings, it should not be a given that such buildings will be of a greater scale of massing than surrounding buildings and it is welcomed that this is only stated as something that 'could' be included. Further consideration will be given to the proposed locations and types of landmark buildings in due course as part of the detailed design process.	The term SUDs landscape refers to the proposed SUDs features at the periphery of Finch Woods, identified as being required to drain the southern Bellway parcel. We can change this to "SUDs features" in the final masterplan, to provide clarity. We acknowledge that some flexibility needs to be applied in the incorporation of landmark buildings within the site.	No	Changed "SUDs landscape" to "SUDs features".
Lichfields	3.80	Point 6 of paragraph 6.28 (page 82), refers to the Higher Road Corridor as a significant arrival gateway. Vague reference is made here, as well as	This has been identified as a potential highway and place making intervention, to ensure that the nature of the stretch of Higher Road within	No	Further details about highway improvements needed are included in the final Masterplan.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		elsewhere in the document to a 'reconfigured carriageway' which would incorporate a widened central reservation and removal of the existing lay-by (located adjacent to Plot 6). It is important to note that the transport assessment work has not identified any requirement to reconfigure the carriageway in this location to make the development acceptable. It should therefore be made clear that if this is pursued, it will be a Council led initiative and not a requirement arising from the development of the East Halewood SUE. This reflects previous discussions that have taken place between the Council and the Housebuilders.	the SUE site reflects the residential environment that will enclose it. We acknowledge that further evidence is needed to support the identification of highways improvements, as well as details of the timing and method of their delivery. We continue to work towards finalising this evidence, on which we will be seeking further input from the housebuilders, and which will be available to support the final Masterplan. We note the provision of the Curtins note in this regard. We consider that the permanent closure of the layby on Higher Road, and the incorporation of this land into a widened southern development parcel, will be of considerable benefit and is supported by the adjacent landowner.		
Lichfields	3.81	Paragraph 6.34 states that cul-de-sacs should be avoided as they result in higher traffic levels. The Housebuilders would welcome sight of the Council's evidence base to substantiate this comment.	We acknowledge this wording requires revision – it should instead refer to the intensification of traffic on main routes as a result of lack of permeability arising from the use of cul de sacs. The masterplan seeks to overcome this issue through its aim to ensure that the East of Halewood site is internally connected and hence permeable, allowing for	No	Amended wording referring to issues associated with cul de sacs in the final masterplan.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
			appropriate distribution of traffic flows.		
	Street Movement and Hierarchy (06c)				
Lichfields	3.82 and 3.83	Section 06c provides design guidance in respect of 'street movement and hierarchy'. A street hierarchy plan is shown at Figure 6.6 (page 85). The street hierarchy identifies the following tiers: 1 Primary Streets; 2 Secondary Streets; 3 Minor Access Streets; 4 Lanes; and, 5 Private Drives. Detailed guidance is provided between pages 86 and 115. The Housebuilders have comments in respect of the guidance associated with each of the proposed street tiers as set out below.	Noted.	No	No
Lichfields	3.84	**Primary Streets** Reference is made to a proposed bus route through the site. The Housebuilders have agreed in principle to provide this. However, no agreement has been made and this is an evolving matter of which no clarity yet exists. It is unclear from the draft Masterplan if the Council has had any discussions with Mersey Travel in respect of a	With respect to the proposed bus route, we have liaised with Merseytravel, who support the inclusion of an internal route, and new bus stops, within the site. We disagree that verges are only required on primary streets that accommodate a bus route – wide verges are a key feature of all primary routes within the site.	No	Clarified that Merseytravel support inclusion of bus route and stops. Reduce verge width to 2.0m on primary routes

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		proposed bus route and clarity would be welcomed on this. In terms of requirement for 2.1-metre verges, this should be reduced to 2.0- meters and only be required on primary streets that may be subsequently identified to accommodate a bus route. The key guidance states that parallel visitor parking spaces will be provided within the depth of planted verge. This should be **deleted** as the Housebuilders will provide visitor parking elsewhere within their respective parcels.	We are happy to reduce the width of verges to 2.0m. We consider that provision for parallel visitor parking spaces may form a desirable part of a parking strategy (depending upon subsequent detailed development configurations), ensuring the routes are clear and avoiding parking on grassed verges. This is particularly important on primary and secondary routes.		
Lichfields	3.85	The Housebuilders object to commentary requiring swales to be provided alongside primary streets that front onto POS. As part of the Masterplan baseline exercise, the Housebuilders have provided a site wide Flood Risk Assessment and Drainage Strategy which demonstrates that the site can be effectively drained without incorporating swales.	Please see above commentary. We accept that the spatial prescription of the location of these facilities is not necessary within framework plans; however we consider that identifying potential locations, and the specification for such facilities should they be included, will be helpful.	No	Final masterplan provides guidance on the inclusion of ponds and swales but does not prescribe spatial locations for their use.
Lichfields	3.86	The Housebuilders do not support commentary specifying that buff / bracken keyblock paving, rosehill 1-piece speed cushions or conservation block paving should be required in relation to raised table and traffic calming measures. This prescriptive detail is considered to be excessive	We do not agree that the level of detail represents excessive prescription; indeed, materials used within the highway represent one of the key areas within which consistency throughout the site will be important.	No	The final masterplan includes some limited revisions to materials, including removing the use of permeable paving, and minor changes to the boundary treatments –

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		and goes beyond the remit of what should be reasonably be required by the Masterplan. Furthermore, there are maintenance issues associated with block paving and the Housebuilders have had recent experiences where Local Highways Authority's [LHA] have refused to adopt them. In this context, such proposals have the potential to run contrary to the aspiration for primary streets to be built to adoptable standards and should therefore be **deleted**. In addition, there is no evidence to suggest that the cost implications of such measures have been considered and that such features are anything more than aspirational. In terms of the proposed 1.1-metre- high boundary walls and railings along all primary streets, this is considered excessive and should at the very most only be provided along bus routes.	The inclusion of specifications within the masterplan has been undertaken in consultation with the LHA, and there is no concern on their part that specifications will result in un-adoptable roads or infrastructure. We consider that walls with railings along primary street frontages will provide a consistent, high quality boundary treatment to key corridors. This is consistent with the nature of primary routes as formal avenue-type streets within the site. In comparison to planted alternatives, it is also lower maintenance and has greater longevity. We do not consider this inclusion excessive.		for example the removal of hedges on avenue streets.
Lichfields	3.87	In specific relation to Plot 3, Redrow do not support the provision of a dedicated pedestrian/cycle route running adjacent to the proposed primary street and bus route. The draft Masterplan specifies that a 3-metre dedicated pedestrian / cycle path should be provided along typical primary streets with a bus route such as that proposed on the primary street running adjacent to the proposed separate dedicated pedestrian cycle	We agree that there is some merit in further rationalising/clarifying the provision of cycleways within the site, to ensure a clear route is provided and to reduce duplication of infrastructure. This is reflected in the final masterplan.	No	Rationalised cycleway routes are shown within within the final masterplan.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		route. Given that the primary street is already proposed to incorporate a dedicated pedestrian/cycle route, the benefits of providing a separate route which starts and finishes in a similar location is unclear. Redrow contend that the requirement is excessive and would serve no further benefit to what would already be achieved from providing a dedicated pedestrian/cycle route along the alignment of the primary street.			
Lichfields	3.88 and 3.89	The KLPCS [Policy SUE2] makes it clear that the Masterplan has a very particular role, which is to namely fulfil the requirements of Policy SUE2 of the KLPCS: 3. *For each of the locations referred to in Policies SUE2a to SUE2c), the Council* ***will prepare a Supplementary Planning Document, which will provide a proposed spatial development framework*** *for the site together with further details of development and infrastructure requirements.* 4. *Proposals for development within each of these locations will only be granted planning permission where they are consistent with a single detailed master plan for the whole of the Sustainable Urban Extension which is approved by the Council.* ***The***	As above, we agree that there is some merit in further rationalising/clarifying the provision of cycleways within the site, to ensure a clear route is provided and to reduce duplication of infrastructure. This is reflected in the final masterplan.	No	Rationalised cycleway routes are shown within the final masterplan.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		master plan should accord with development plan policy and any associated Supplementary Planning Document and may be submitted prior to or with the application. Planning permissions must be linked to *any necessary legal agreements for the improvement, provision, management and maintenance of infrastructure, services and facilities, open spaces and* ***other matters necessary to make the development acceptable*** *and which facilitate comprehensive delivery of all phases of development within the Sustainable Urban Extension in accordance with the single detailed master plan.* The key point to note is that Policy SUE2 of the KLPCS only imposes requirements relating to the provision of infrastructure if it is deemed to be necessary to make the development acceptable. There is no evidence to justify a proposed requirement to provide two dedicated pedestrian / cycle routes along a similar alignment. This is clearly not necessary to make the development acceptable as the two routes would not provide no further benefits to a single route. As such, we contend that the draft Masterplan does not accord with Policy SUE2 of the			

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		KLPCS in this regard.			
Lichfields	3.90	In addition, from a layout perspective, the proposed additional dedicated pedestrian/cycle route has significant implications and siting dwellings between the two routes is unpractical from an urban design perspective. The draft Masterplan (page 109) states that the proposed route should be designed and built to adoptable standards. It is however not explicit as to whether or not it would be the Council's intention to adopt such a route if provided.	Please see above response. If provided to adoptable standards, it would be the Council's intention to adopt the dedicated pedestrian / cycle route.	No	Rationalised cycleway routes are shown within the final masterplan.
Lichfields	3.91	On the basis of the above, Redrow's preference would be for the element of the separate dedicated pedestrian / cycle route running adjacent to the primary street through Plot 3 is **deleted** from the draft Masterplan and all other associated plans contained within the document. Redrow would welcome the opportunity to discuss this matter further.	Please see above response. The revised alignment accounts for the points made in this consultation response.	No	Rationalised cycleway routes are shown within the final masterplan.
Lichfields	3.92	**Secondary streets** In respect of the guidance for secondary streets (pages 92/93), the Housebuilders support the commentary that all secondary streets should be fronted on both sides. General comments are reflective of previous	We do not agree that the level of detail represents excessive prescription; like materials, signage used within the highway is a key area within which consistency throughout the site can be achieved. We consider that provision for	No	Clarification provided on interface in accordance with the SPD 'New Residential Development', explaining flexibility is appropriate in some circumstances.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		comments in terms of the prescriptive nature of the requirements. For example, it is considered excessive to specify that street signage should comprise 'cast aluminium signs RAL 226 – green'. The Housebuilders also object to requirements to provide on street visitor bays which is considered to be excessive as visitor parking will be provided elsewhere within the site. It considered that specifically restricting front to front distances to 20 metres is restrictive and would reduce the ability to create an interesting street scene. This should therefore be reviewed.	parallel visitor parking spaces may form a desirable part of a parking strategy (depending upon subsequent detailed development configurations), ensuring the routes are clear and avoiding parking on grassed verges. The Council's Supplementary Planning Document 'New Residential Development' (September 2018) Appendix 4 provides specific detail regarding interface distances. For front to front elevations should aim to achieve at least 20 metres interface distance, however the guidance does go on to state that any reduction below this can be agreed with the LPA on a plot by plot basis. The guidance also provides and exception for dual aspect properties. The final masterplan content will be consistent with this guidance.		
Lichfields	3.93	**Minor Access Streets** Our previous comments in respect of primary and secondary streets also apply to the guidance for minor access streets. The provision of conservation block paving is not supported as there are significant maintenance issues and it is unlikely to be adopted. Likewise, formal hedging along minor access	As per above responses, materials have been included with the support of the LHA as being adoptable. We do not consider that the provision of hedging as boundary treatments is excessive; this more informal treatment is appropriate on lower order routes, and will provide consistency across the site. There is	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		streets is considered excessive. In addition, minor access streets should not be restricted to serving a maximum of 25 properties. This is restrictive.	sufficient flexibility provided on species use within the masterplan. We consider that restricting the number of properties serviced by a single minor access street is not unduly restrictive; this will ensure penetration of higher order routes throughout the site.		
Lichfields	3.94	**Lanes** As noted above, permeable block paving is excessive to what will be a significant area as lanes make up a large area of road coverage. Furthermore, it has already been accepted by the Lead Local Flood Authority [LLFA] that infiltration soakaways are not an appropriate drainage solution due to the low permeability of underlying soils within the site. The technical notes setting out this position and the subsequent LLFA acceptance in respect of Plots 1 and 3 are enclosed at Appendix 2.	We accept that the proposed materials for the carriageway for lanes, and more generally for driveways, are not appropriate given the impermeable ground conditions within the site. An alternative specification of non-permeable block paving will be included in the final masterplan. As per above responses, materials previously and now included have the support of the LHA as being adoptable.	No	Changed specification of lane carriageway, permeable carriageway and drive way materials, reflected in final masterplan.
Lichfields	3.95	From experience, the Housebuilders have found that block paving always has maintenance issues and as stated above, most LHA's now refuse to adopt them. If the adoption of block paving is acceptable to the LHA in this instance, it is unclear how will it be maintained if	Please see above response in relation to alternative materials for lane carriageways and driveways. As per above responses, materials have been included with the support of the LHA as being adoptable.	No	Changed specification of lane carriageway, private drive carriageway and drive way materials, reflected in the final masterplan.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		damage or disruption occurs. This also applies to service providers needing to carry out maintenance works to their network (which they have the rights to do). It is unclear if repairs to block paving would involve reinstatement or tarmac patching. Tarmac patching is clearly the most cost- effective solution but is detrimental from a visual amenity perspective. It is unclear if any such discussions have taken place with the LHA Adoptions Team and indeed if confirmation has been sought that it would in fact be adopted. It is important that lanes are adopted to remove the risk of dispute between residents in respect of maintenance issues. The Housebuilders would welcome sight of comments provided by the LHA adoptions team in respective of the full range of proposals set out within Section 06c of the draft Masterplan.	With regards to the risk of unsightly tarmac repairs to paved surfaces, this is actually avoided through the use of paving as the units can simply be lifted and reinstated – utilities are obliged to reinstate with the same and are not permitted to use permanent tarmac repairs. We have also set out in the masterplan that a dowry of materials will assist with ensuring necessary repairs are undertaken with consistent materials.		
Lichfields	3.96	**Private Drives** It is recommended that the maximum number of properties to be served by private drives is uplifted from 3 to 5 in line with what is generally acceptable elsewhere. This is the only way the design aspirations around the periphery of the site can be achieved. It is not possible to provide a pedestrian footpath link between private drives as	We acknowledge the housebuilders' wish for more flexibility for the expanded use of private drives across the site, however we do consider that a proportionate approach needs to be taken in the masterplan – whereby 3 properties or a 25m maximum length facility are prescribed. The masterplan reflects the specific request of the housebuilders to make provision for	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		these areas are deeded properties and will not be publicly accessible. This should therefore be removed. Single sided adopted highways are expensive and will add significantly to the cost. All other comments in respect of materials also apply to the guidance on private drives and the Housebuilders do not support the prescriptive nature of the materials identified (which are also considered to be excessive for private drives). Furthermore, private drives will fall into private ownership and the maintenance of proposed materials is considered to be onerous on residents. Please ref to our comments above (§3.94), in respect of the proposed materials for driveways which are also considered to be excessive.	the use of private drives, which would otherwise generally be resisted by the Council. We recognise that their use could deliver helpful solutions in limited parts of the site, however we are clear that this will require careful deployment and high quality materials. We consider links between private drives to be an essential component of ensuring permeability throughout the site, for emergency access and for pedestrians. We believe that other lower order highway typologies, such as the Lane, can also be deployed in these locations as an alternative solution. Please see above responses in relation to the carriageway and driveway materials.		
Lichfields	3.97	**Pedestrian / Cycle Routes** In respect of the proposed dedicated pedestrian / cycle route through the site, please refer to our previous comments at paragraph 3.74 in relation to Plot 3. In a broader sense this proposed route is not supported. In particular, the Housebuilders strongly object to proposals to open up the redundant railway arch located within	As noted above, we agree that there is some merit in further rationalising/clarifying the provision of cycleways. As noted above, we consider that opening up an additional railway arch on Lower Road needed to address existing pedestrian safety issues, to ensure continuity in the cycle/footpath network proposed, and	No	Rationalised cycleway routes are shown within the final masterplan.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		the site. We understand that this land is owned by Network Rail and is therefore outwith the control of the Housebuilders. As such, the Housebuilders would be unable to provide any such connection through the site due to the requirement to use third party land. In any case, we believe that the proposals to open up the railway arch pose a security risk due to a lack of natural surveillance and we contend that a footpath link in this location would not provide 'safer connectivity' between the north and south parcels on this basis.	also represents an opportunity for a key place making asset for the site. We strongly disagree with the argument that this poses a security risk; on the contrary, we consider the scheme will deliver substantial safety improvements in this location. We accept that this scheme would require the support of Network Rail as landowner, and also in relation to safeguarding the existing railway infrastructure. The Council continues to pursue this matter with Network Rail. Alternative mitigation measures to accommodate safe pedestrian/cycle connections could be considered if this preferred option is not ultimately viable.		
Lichfields	3.98	In addition, we would question the need for this connection because residents are more likely to utilise links to Baileys Lane and on towards Halewood Local Centre rather than between the parcels and this is a key aspiration for the Masterplan. The existing footpaths / pavements in the area are already more than adequate and further upgrades to the existing footways along Lower Road are proposed. On this basis, the Housebuilders request that the proposed link is removed as it would	We disagree with this point, as we consider providing a north-south walking/cycling connection within the site, as well as east-west connections to the Halewood settlement, is important. This is to connect less accessible parts of the site with east-west corridors, as well as providing direct access for new residents to new open spaces which are an integral part of the site, including Finch Woods. The Lower Road link is the preferable route for connecting the main northern and	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		serve no further purpose than the existing link via the adopted highway. In terms of the wider proposals for a dedicated pedestrian / cycle route (page 108/109), the titles should be amended to refer to a potential dedicated pedestrian/cycle route. The text box at the top of page 108 should be amended to state; *A strategic segregated walking and cycling route **could potentially** provide connectivity north-south within the site, ensuring that pedestrian and cycle movement equitable to that of vehicles and within a safe and designated area.*	southern parcels.		
Lichfields	3.99	It is unclear whether or not pedestrian / cycle routes that are agreed will be adopted by the LHA. The same applies to the proposed lighting on the pedestrian / cycle routes. The Housebuilders would welcome clarity on these matters from the Council. The requirement for unadopted routes and lighting will place a significant burden on the development that will need to be factored into any viability considerations.	For clarity, as noted above, if provided to adoptable standards, it would be the Council's intention to adopt the dedicated pedestrian / cycle route. Again as previously noted, we have worked towards finalising viability evidence, which includes accounting for the cost of materials set out within the design guide.	No	No
Lichfields	3.100	**Parking Strategy** Paragraph 6.41 states in respect of apartment blocks that rear parking courts will be provided for resident	Rear parking courts are likely to be the only acceptable solution for apartment blocks; alternative solutions would deliver an unacceptable impact on the street	No	Final masterplan reflects some flexibility about the use of parking courts.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		parking. This is too prescriptive and should be amended to state that rear parking courts could '***potentially***' be provided.	scene. We are happy to add some limited flexibility to the masterplan to respond to the concerns, i.e. that where apartment blocks and terraced housing is provided, resident parking will be **primarily facilitated** through rear parking courts, and any communal parking areas will be limited to ten spaces. However excessive frontage parking will not be acceptable due to its likely negative impact on the streetscape.		
Lichfields	3.101	**Electric Vehicle Charging Points** Paragraph 6.50 states that EVC Points should provide trickle spec charging. The Housebuilders support this approach as this reduces impact on the electricity network. The Housebuilders will continue discussions with the Council in respect of the provision of EVC Points at East Halewood.	Noted and welcomed.	No	No
Lichfields	3.102	**Utilities** Paragraph 6.55 states that future development on site will require a dowry deposit of materials for replacing materials. It is unclear what the policy basis for this request is. This is not standard practice for residential	Please see above response in relation to concerns about future repairs of highway; we consider this to be an appropriate and cost effective solution to ensuring availability of materials to deliver quality repairs in the future.	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		development sites and it is recommended that the paragraph is **deleted**.	An alternative is that through the adoption process (s38, etc.), the Council requests a commuted sum be provided by developers to purchase materials for future maintenance. We consider that the approach set out in the masterplan will be preferable for developers.		
	Landscape, Ecology, SUDS and Green Infrastructure (06d)				
Lichfields	3.103	Reflecting our previous comments, the reference to SUDS should be removed from the key relating to Figure 6.31 (page 119) in relation of the raindrop identifying the potential location for a pumping station on Plot 5.	As noted earlier, we are working with Miller Homes to fully investigate options for surface water drainage, and particularly to ensure there is sufficient technical evidence, that is agreed with the LLFA and UU, to justify the use of a pumping station here, if appropriate.	No	Retained flexibility for drainage solution for the Miller parcel in the final masterplan.
Lichfields	3.104	In addition, this section incorporates a range of indicative diagrams and sketches that we consider to be potentially misleading as discussed below.	Responses provided below.	No	No
Lichfields	3.105	**Landscape & Ecology** In general, the main principles of landscape design and management are considered to be sound and seek to achieve a high-quality environment with different character zones.	Noted and welcomed.	No	No
Lichfields	3.106	Whilst the specification of plants is not	Like highway materials, a considered	No	Clarification added the

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		unreasonable as such, the Housebuilders do not support the inclusion of this within the draft Masterplan. This is considered to be over the top for inclusion within a strategic document. Furthermore, the palette of plant species set out in the appendices is considered to be restrictive. It is unclear if work has been carried out to establish the availability and costing of the species listed.	planting strategy is one of the key mechanisms by which consistency throughout the site can be achieved. We do not consider that the approach taken here is unduly restrictive; there is plenty of flexibility within the range of species identified for each character area. The variety shown is to allow flexibility for developers to pick from a range of species suitable to the area. These have been selected with availability in mind. With respect to cost, again as previously noted, viability evidence to support the final masterplan will include accounting for the cost of planting specifications set out within the design guide.		species have been selected with availability in mind.
Lichfields	3.107	It should be clarified that this is only to be regarded as guidance rather than strict requirement as to allow flexibility in choosing suppliers and plant variety. Notwithstanding this, the Housebuilders preference would be for the planting schedules contained within the appendices to be **deleted** as it is too prescriptive for a Masterplan. It is considered that it would be more appropriate for suitable species and planting regimes to be determined by the Housebuilders ecologist/landscape	We consider the masterplan's content to be the ideal opportunity to discuss an agree species and planting regimens, between the Council and the housebuilders. This will ensure a consistent approach across parcels; there is a considerable risk of inconsistency in approach should this be left to individual housebuilder negotiation.	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		architect in consultation with their counterparts within the Council in due course.			
Lichfields	3.108	In respect of the requirement for the provision of semi mature trees to be planted (20-25cm girth), these are very expensive and if limited to the proposed palette then availability and supply may be an issue. It is the Housebuilders view that smaller tree sizes would be acceptable and require less maintenance/regular watering during establishment (which for semi mature trees is recommended to be longer than the first year or two). Semi mature trees and larger nursery stock can be vulnerable to drying out and can be slow to establish whereas smaller plants may establish quicker. On this basis, the proposed planting sizes (page 120) should be reconsidered. It should be confirmed whether or not the Council are planning to adopt trees provided as part of the development.	We consider that specifying the girth and the maturity of trees provided is a critical element in ensuring that planting provided has immediate impact, and also in ensuring consistency in provision across the site. We do not accept the stated risks associated with younger specimens outweigh the benefits of seeking the standards set out in the masterplan. As noted previously, tree species have been selected with availability in mind. It is the Council's intention to adopt the highway, so where trees are provided as part of this, they will be part of the adopted highway and maintained as such.	No	No
Lichfields	3.109	The figures (figure 6.23/6.33) located on page 122 comprise a significant level of detail. It is unclear how it could possibly be ensured that planting appears this way below ground. The figures should therefore clearly be marked as indicative.	This approach is consistent with the guidance for tree planting included within the Council's adopted Trees and Development SPD. We do not consider that adding "indicative" to this drawing would be of any benefit.	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
Lichfields	3.110	In respect of the proposed use of 'bat bricks' (page 135), the Housebuilders do not consider these to be appropriate as MEAS have consistently accepted bat boxes. Furthermore, the text suggests that MEAS have not yet been consulted on this matter.	We are happy to change the masterplan to allow for additional flexibility around this issue, bat bricks or bat boxes can be acceptable.	No	Added further flexibility about the use of bat bricks and boxes
Lichfields	3.111	In summary, the Housebuilders believe the planting and habitats strategy to be unreasonable and excessive. Clear caveats should be added to clarify that it is indicative only and that the implications of the proposals on the schemes cost are yet to be verified. In any case, the Housebuilders believe that these are matters that should be agreed at the detailed design stage, potentially through the use of planning conditions.	As explained above, we disagree with this contention. We consider there is sufficient flexibility within the masterplan on this matter. We agree that there is a clear role for the detailed design stage, for developers to demonstrate how they have responded to the guidance in section 6; this does not diminish the necessity for the site wide guidance to be set out within the masterplan document.	No	No
Lichfields	3.112	**Play & Recreation Guidance** Figure 6.36 (page 137) is considered to be unclear and excessive given that the location of NEAPs and LEAPs is already identified on Figure 5.7 (page 49). Some of the icons are potentially misleading. For example, the fishing icon placed on the private lake located adjacent to Plot 2 suggests that this is open to the public. It is also unclear what is meant by natural play features	We disagree that this figure doesn't add any further detail, it shows how key recreation and play facilities will be linked together, including informal opportunities outwith of the NEAPs and LEAPs. We agree that clarification can be provided as to which of play and recreation opportunities are publically available, and which (like the fishing pond) are for private use only. We	No	Clarifications added to figure about public/private facilities. Clarification about natural play features has been added. The final masterplan provides further clarification as to the role and function of the

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		and we would welcome clarity on this point. The Housebuilders also object to the icons located within the FSA/NIA that indicate that this area will be publicly accessible. The purpose of Figure 6.36 is not entirely clear, and it is recommended that it is **deleted**.	disagree that the FSA/NIA should fall under the latter category; as noted in our previous responses, we acknowledge that the Masterplan needs to provide further clarification as to the role and function of the NIA / FSA, particularly in terms of its POS function. We are happy to provide further clarification on natural play features.		NIA / FSA, particularly in terms of its POS function
Lichfields	3.113	It is acknowledged that the Council will be providing additional information relating to the provision of POS in due course and we will provide further comments in respect of play provision once this has been made available.	Noted.	No	No
Lichfields	3.114 and 3.115	**SUDS Guidance** The drainage strategy for the development is a matter that is subject to ongoing discussions and negotiations. The Housebuilders have provided detailed Flood Risk & Drainage Strategies for the site that have formed the baseline of the draft Masterplan. Notwithstanding this, the draft Masterplan proposes a range of SUDS features that have not previously been discussed or agreed. The Housebuilders are proposing all	The draft masterplan reflects the housebuilders desire for a focus on ponds, as supported by evidence for selected parcels. However, it is not correct to say that all housebuilders are proposing attenuation in ponds. As previously noted, we have accepted that permeable surfaces and soakaways are not appropriate given ground conditions; hence clarification of this will be reflected in the final masterplan. Notwithstanding this, we still consider there is a role for SUDs features	No	The final masterplan provides guidance on the inclusion of ponds and swales but does not prescribe spatial locations for their use.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		attenuation within Ponds which are considered to be more aesthetically pleasing than detention basins throughout the year. Ponds also provide the required amount of treatment for residential developments. Whilst swales could be incorporated throughout the site and would reduce the overall size required for the ponds, this has implications elsewhere in respect of the developable area if proposed instead of highway drainage. The benefits of swales are considered to be limited. Furthermore, it has already been accepted by the Lead Local Flood Authority [LLFA] that infiltration soakaways are not an appropriate drainage solution due to the low permeability of underlying soils within the site. The technical notes setting out this position and the subsequent LLFA acceptance in respect of Plots 1 and 3 are enclosed at Appendix 2.	which effectively slow the flow of surface water within the development and also play a role in treating pollution; rain gardens and swales are potential solutions here. We have not seen sufficient evidence from housebuilders to exclude their likely use completely – this is particularly relevant when there are parts of the site outside of the housebuilders' control. As noted above, we accept that the spatial prescription of the location of these facilities is not necessary within framework plans; however we consider that identifying potential locations, and the specification for such facilities should they be included, will be helpful.		
Lichfields	3.116	Rain Gardens are similar to swales and cannot offer much in the way of attenuation. We would therefore question the merit of their inclusion.	The roles of swales and rain gardens is about slowing the flow of surface water, including facilitating evaporation, and also about providing habitats, treating pollution, etc. Please see above comments.	No	The final masterplan provides guidance on the inclusion of ponds and swales but does not prescribe spatial locations for their use.
Lichfields	3.117	In respect of permeable paving, please	As per our previous comments, we	No	As previously noted.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		revert to our previous comments (§3.115) with regards to ongoing maintenance issues for future residents/management companies and adoption issues. Furthermore, permeable paving offers no Amenity or Ecology benefits unlike the proposed attenuation ponds which are much more likely to be adopted.	agree that permeable surfaces will not be an appropriate solution here, hence our changes to materials and driveways.		
Lichfields	3.118	In light of the above, it is recommended that caveats are introduced to make it clear that this approach is yet to be agreed and is indicative only. For example, paragraph 6.65 should be amended to state; *The approach to SUDS and water management across the sites **could** incorporate the following components*. It is recommended that Rain Gardens and Permeable Paving are removed from Table 6.17 and throughout the document.	We are happy to add this caveat in, although we don't consider that this should exclude the consideration of these potential solutions within schemes. As per our previous comments, we agree that permeable surfaces will not be an appropriate solution here, hence our changes to materials and driveways.	No	Wording change incorporated in final masterplan.
Lichfields	3.119	In respect of Figure 6.37 (page 141), this is considered to be potentially misleading and unclear. For example, the placement of proposed swales and permeable paving appears to be random and it is unclear what this is based on. We therefore recommend that Figure 6.37 is **deleted**.	We consider retention of this figure in some form is useful within the masterplan, particularly as it clearly shows existing and proposed ponds, field drains, etc. We agree this diagram could be made clearer, through instead providing spatial "zones" of where rain gardens and swales could be used.	No	Changed diagram to show zones rather than symbol approach.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
Lichfields	3.120	At paragraph 6.76 (page 148), it is unclear where the guidance stated within the listed bullets is from. For example, surface infiltration rates of 2,500mm/hour are considered acceptable for surface water management. The Housebuilders would welcome clarity on where these standards have been derived.	The detailed guidance on infiltration rates can be removed from the final Masterplan, as this method of drainage is not considered suitable at East of Halewood, due to ground conditions. Drainage options summary can also be updated to reflect this.	No	Detailed guidance on infiltration removed from the Masterplan.
Lichfields	3.121	Paragraph 6.78 (page 150) refers to the western boundary of the site along Finch Lane. This is the sites eastern boundary. Bullet 5 states that EA access to existing drainage ditches within boundary space should be retained. This should be **deleted** as these are outside the EA's remit.	Mistake in referring to western rather than eastern is noted and will be rectified. The final masterplan will include clarity about necessary access / maintenance regimes for main rivers I.e. Ditton Brook as well as ordinary water courses. This will make clear the responsibility for the latter category falls to landowners / riparian owners rather than the Environment Agency.	No	Mistake corrected in final masterplan Clarification on maintenance requirements for watercourses added to the final masterplan.
Lichfields	3.122	The Housebuilders would welcome further discussions in respect of the sites drainage strategy and would be keen to discuss the key issues associated with much of what is proposed within the SUDS strategy section in more detail.	Noted and welcomed.	No	No
Lichfields	3.123	**Public Art & Wayfinding**	We are open to discussion with the housebuilders as to the form and	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		The Housebuilders acknowledge the requirement of Policy CS19 of the KLPCS to provide public art as appropriate. However, Figure 6.42 identifies potential locations for a considerable range of potential features which have not been discussed with the Housebuilders. It should be made clear that this plan is indicative and subject to further discussions. For example, it would not be feasible to provide sculpted landforms within the FSA as the site levels are driven by hydraulic modelling. Figure 6.42 also states that lighting will be provided under the railway bridge. It should be noted that this land is owned by Network Rail and therefore could not be implemented by the Housebuilders.	location of public art within the site. The masterplan sets some helpful parameters for this, including identifying potential locations and ideas. We consider that sculpted landforms could in fact be included within the FSA/NIA area; this is not least to respond sensitively and appropriately to the radical change in levels proposed as a result of the FSA engineering. We note that railway infrastructure is owned by Network Rail, and we continue to pursue with them the opportunity to open up a railway arch for a dedicated walking/cycling route, including the possible provision of public art as part of the scheme.		
Lichfields	3.124	The Housebuilders are unsure if there is a policy basis to support the proposed wayfinding strategy and would welcome further justification as to why this is necessary to support the development. The preference would be for the section on wayfinding and signage to be removed from the draft Masterplan or at the very least updated to state that it is encouraged rather than a requirement.	Given the size of the East of Halewood site, and the fact that it will deliver new sustainable transport infrastructure and POS, there are strategic benefits to including a way finding strategy and information boards. In addition to being practically useful for residents and visitors, it will help to embed a sense of place across the new development. Again, this is an element of site development that will	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
			significantly benefit from a joined up approach across the site. Our preference is therefore that the content remains within the Masterplan; there is already sufficient flexibility about how it is implemented.		
Lichfields	3.125	In respect of Figure 6.46, it is recommended that the grave to plot frontage figure of 27 metres is **deleted** as this is considered to be too prescriptive. The road pattern shown on this plan does not appear to accord with the road hierarchy shown on the access and movement framework plan and this should be reviewed.	This diagram will be reviewed, along with the "key space and place" guidance for Blackie's grave, and will be consolidated into a single section within the masterplan. We have worked with Miller Homes, as well as the Council's internal team including our conservation officer, to agree a scheme for inclusion in the masterplan.	No	Revised scheme for Blackie included in the final masterplan.
Lichfields	3.126	**Street Furniture** The proposed street furniture and lighting palette is considered to be too prescriptive and should be marked as indicative (paragraph 6.89). This level of detail is considered to exceed what is appropriate for the Masterplan to consider.	As per previous responses, we consider that this element of the masterplan is an excellent example of how it can be a helpful tool for all developers in delivering consistency and quality across the development site. By agreeing specifications for furniture, it can be consistently incorporated within the public realm throughout the site. The furniture sought is standard, in line with that sought elsewhere by the Council. If there is alternative furniture that the housebuilders would prefer us to include, then we are happy to	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
			discuss this further.		
	Development Sustainability (06e)				
Lichfields	3.127	The Housebuilders support the delivery of sustainable development at the site and do not object to Section 06e of the draft Masterplan. We would however ask that this section is reviewed in accordance with our previous comments for example, in respect of references to block paving. References to green roofs and grey water recycling at bullet 6 (page 164) should be **deleted**.	Noted and welcomed. We note the need to update the masterplan as per previous responses on permeable surfaces. However we are reluctant to agree to the removal of references to water recycling and green roofs; the masterplan makes clear these are encouraged but should only be included where possible.	No	Changed specification of lane carriageway, private drive carriageway and drive way materials.
Lichfields	3.128	Paragraph 6.95 (page 166) states that solar panels should be integrated within the roofscape, particularly along primary frontages. However, there is no specific policy requirement for such a measure. Future residents reserve the right to consider the use of solar technology, but this is not something that can be mandated by the Masterplan. The reference to solar panels should also be **deleted**.	The masterplan gives guidance for solar panels where these are proposed, rather than requiring them per se. We are happy to update the text to reflect this, however we don't agree that this should be deleted, as it provides useful guidance for any proposed future schemes (even if the housebuilders do not intend to provide them). Knowsley Local Plan Core Strategy Policy CS22 and Supplementary Planning Document 'New Residential Development' provides further clarification on the use of solar technology.	No	Provided clarity about the role of guidance on solar panels within the final masterplan.
	Built form and materials (06f)				
Lichfields	3.129	The Housebuilders welcome the	We disagree that the table should be	No	Updated table included

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		comment on page 168 (within the orange box) that the design guide will not prescribe the details of architectural design. The house types provided at the site will ultimately be driven by market conditions and demand. The built form summary provided in table 6.17 (page 171) is considered to be overly prescriptive and should be **deleted**. For example, it is stated that two storey dwellings should be limited within the 'Woodland Edge' Character Area. However, there is no market evidence to support this.	deleted; while we acknowledge that architectural details should not be prescribed by a masterplan, the table represents a useful resource for the housebuilders to use. We are happy to add some further commentary to explain its intended use, which hopefully will provide assurance to the housebuilders.		within the final masterplan and additional illustrative material regarding the ridges and eaves principles.
Lichfields	3.130	The table located on page 173 is also considered to be too prescriptive and excessive. The Housebuilders request that this section is **deleted**.	We do not consider that this table is too prescriptive; like other parts of the design guide, this is an excellent example of the Council providing advice to be consistent applied across the site. Much of the table's content is taken from other parts of the design guide, and hence it is considered helpful to pull this together in a single location.	No	No
	Key Spaces and Places (06g)				
Lichfields	3.131	Section 06g relates to 'Key Spaces and Places'. The purpose of this section is unclear and seems excessive when considered in the context that there are already proposed Character Areas. It is recommended that the spaces and places identified in this section are	We don't agree that this section is not needed or is excessive; this section identifies key locations, particularly where this is a strategic gateway or an important POS part of the site, that clearly benefit from further design consideration. This is	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		simply integrated into the proposed Character Areas. A separate section on these areas is excessive. For example, densities are prescribed for both the key spaces and places as well as for character areas.	geared towards being helpful to developers, in setting the parameters that the Council will be looking for a response to, as well as practical, implementable ideas about how this can be achieved.		
Lichfields	3.132	In addition, this section incorporates a range of indicative diagrams and sketches that we consider to be potentially misleading. For example, the sketch located at page 178/179 shows large SUDS ponds and housing with no driveways. This is not reflective of what will actually be delivered. In respect of the Ditton Brook concept zoning plan (page 189), please refer to our previous comments in respect of concerns around public access to the FSA/NIA. The concept proposals show footpaths and a cycle way running through the FSA. Firstly, this is not achievable due to the levels difference between the developable area and the FSA. In addition, allowing public access onto the FSA restricts its ability to function and there are also implications on its dual function as a NIA. Any POS located within the FSA would reduce its ability to operate at capacity, significantly reducing its effectiveness as a flood defence. Whilst it is acknowledged that this is identified as 'high level concept proposals', we recommend that this is	We agree that the sketches included here would benefit from partial review and updating to better reflect the development type likely to be delivered within the site, and also to ensure appropriate densities are included. Please see our earlier responses in relation to the FSA/NIA - we acknowledge that the Masterplan needs to provide further clarification as to the role and function of the NIA / FSA, particularly in terms of its POS function, and this will need to be reflected in the final "key spaces and places" section of the Masterplan.	No	Updated sketch plans are included in the final masterplan. The final masterplan provides further clarification as to the role and function of the NIA / FSA, particularly in terms of its POS function

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		deleted. Redrow are happy to provide the Council with their own concept proposals for the site which could be included within the draft Masterplan.			
Lichfields	3.133	In summary, Section 06g is considered to be excessive and the Housebuilders concede that the key spaces and places could be consolidated into the proposed Character Areas. On this basis it is recommended that Section 06g is **deleted**.	As per our previous comments, we do not agreed with this request.	No	No
	Implementation (07)				
Lichfields	3.134	In respect of the introduction to the Delivery and Implementation Strategy (page 190), the Housebuilders note that; *the Council are committed to exploring external funding opportunities to deliver additional infrastructure where appropriate, in addition to that identified for delivery by the private sector*. However, the draft Masterplan does not actually apportion what infrastructure is required to be delivered by the private sector.	We disagree with this, the masterplan table makes clear the infrastructure which we expect to be delivered in kind by developers, and that which we expect will be delivered through developer contributions. We accept that additional commentary about the role of external funding could be usefully added to the Implementation and Delivery section.	No	Added content on external funding opportunities included in final masterplan delivery section.
Lichfields	3.135	Table 7.1 (pages 192-197) goes on to identify infrastructure requirements for the site. However, there is no evidence available at this stage to support this. For example, in relation to early years education and healthcare (columns 1/2,	We acknowledge that the Masterplan needs to be supported by robust evidence in relation to the developer contribution asks, deliverability and viability.	No	Further clarifications on infrastructure requirements have been provided in the final masterplan.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		page 194) it is stated that insufficient capacity exists to accommodate the demand from new development. However, the evidence base to support these contentions has not yet been made available. The Housebuilders welcome the Council's acknowledgment of this fact and the opportunity to continue discussions and comment further on the infrastructure delivery plan in due course as more information becomes available. At this stage, we have the following comments in respect of Table 7.1: 1 Outdoor Sports – In respect of outdoor sports provision, we understand that new publicly accessible facilities are to be provided at the EFC training ground. It is not clear why this does not provide sufficient capacity to accommodate demand arising from the development for formal outdoor sports pitches. If it is the case, then there can be no justification for any off-site contribution towards provision at Halewood Leisure Centre. 2 Primary & Early Years Education – The Housebuilders welcome sight of the evidence base to support the contention that there is insufficient capacity at the earliest opportunity.	Point 1: We accept that the final Masterplan will need to clarify the role of the EFC pitches, and the requirement for contributions towards outdoor sports in Halewood. Point 2: We have to date liaised with education colleagues within the Council; we will be happy to provide further details behind the education contributions to be sought. Point 3: As above, we have liaised with Knowsley Clinical Commissioning Group on this matter, and can provide further details as requested. Point 4: Please see previous comments in relation to the substation on Lower Road / Greensbridge Lane. With respect to a new primary substation, a recent meeting with Scottish Power was inconclusive about whether this would be needed to support the site. We are hence happy to remove reference to primary substation for the final document. The Council requested to be kept informed about further discussions between the housebuilders and SP. Point 5: As per our previous		

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		Further comments are provided in respect of early years provision within section 4 of this report. 3 Healthcare – The Housebuilders welcome sight of the evidence base to support the contention that there is insufficient capacity at the earliest opportunity. 4 Utilities – As per our previous comments, reference to the relocation of the existing substation at the junction of Lower Road/Greensbridge Lane should be **deleted**. In addition, the reference to provision of a new primary substation should also be **deleted**. This matter is subject to ongoing discussions with Scottish Power and there is no evidence to suggest that the development of the East Halewood SUE in itself leads to a requirement for the provision of a new primary substation on site. 5 Sustainable Drainage – It has been accepted that Plot 5 requires a pumping station and therefore the reference to a solution for RSPCA/Miller Homes parcel still to be determined should be **deleted**. 6 Ecology – The Housebuilders have provided the Council with evidence which demonstrates that the proposals do not give rise to a requirement for off-site mitigation in	response on this matter, we intend to engage with Miller Homes further to ensure there is sufficient technical evidence, that is agreed with the LLFA and UU, to justify the use of a pumping station here. Point 6: The flexibility for this to be fully assessed at the planning application stage needs to be retained within the masterplan.		

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		respect of Ecology.			
Lichfields	3.136	Further engagement is clearly required in relation to infrastructure delivery and the Housebuilders welcome the promise of further information at the earliest opportunity and are committed to working with the Council to agree an approach. The infrastructure delivery table as currently proposed needs to be reviewed and clarified.	Noted.	Noted	Further clarifications on infrastructure requirements have been provided in the final masterplan,
Lichfields	3.137	In relation to the section on parcel interdependencies (page 198), please refer to our comments at paragraph 3.65 of this report. The Housebuilders have significant concerns in respect of the implications that imposed requirements for the delivery of cross boundary infrastructure will have on the deliverability of the wider scheme coming forwards. As stated previously, if a particular parcel is forced to rely on another parcel in relation to (as an example) drainage, there is a real risk that if the delivery of the other parcel was delayed or that particular housebuilder walked away then the interdependent parcel would also be undeliverable. Therefore, it is crucial that no such requirements are imposed on the development and references to working across land ownership boundaries (e.g. paragraph 7.7) should	As previously noted, we fundamentally disagree with this point. Our view is that completely independent delivery of parcels is not achievable, given the interdependencies between parcels in relation to different categories of infrastructure. Acknowledging and accounting for interdependency does not necessarily mean putting barriers in place so that one parcel prevents another from coming forward. Indeed, we have tried the limit the instances of cross boundary infrastructure potentially stalling other parcels coming forward, as demonstrated in our facilitating approach to surface water drainage / SUDs.	No	Interdependencies plan updated in the final masterplan.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		be **deleted**. Notwithstanding this, the Housebuilders have committed to providing a single vehicular connection between Plots 1-5 which contributes significantly to securing a comprehensive and interconnected development. However, the parcel interdependencies plan (Figure 7.2, page 199) identifies two vehicular connections between Plots 3 and 4. There is no evidence to support the requirement for two vehicular connections between these plots and therefore, a secondary vehicular route (to the east of the site) does not represent an infrastructure requirement that is necessary to make the development acceptable. Therefore, the provision of a secondary access between plots 3 and 4 is contrary to the requirements of Policy SUE2 of the KLPCS. Both the parcel interdependencies plan and Table 7.2 are considered to be onerous and should be **deleted**.	However there are some categories of infrastructure, where we consider connections between parcels will need to be proactively facilitated and delivered by developers (and landowners), these are set out in the table and figure. On detailed points: - We are happy to remove the accept a change to drainage dependency if the Miller parcel is proven to require a pumped solution; - We consider that a secondary vehicular access between parcels 3 and 4 is necessary to facilitate adequate vehicle permeability within the site.		
Lichfields	3.138	Please refer to previous comments and remove references to option agreements as this is incorrect.	As previously requested, we would benefit from understanding the legal arrangements between landowners and housebuilders. We are happy to remove references to options.	No	Reference to option agreement removed.
Lichfields	3.139 and	In respect of page 202-205, the Housebuilders have the following	Point 1: Paragraph 7.13 makes this clear, so there is no need to repeat	No	Clarification in relation to point 2 added to the final

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	3.140	comments: 1 Paragraph 7.12 (page 202) – A caveat should be introduced making it clear that the provision of 25% affordable housing is subject to viability. 2 Paragraph 7.17 (page 202) – It is stated here that all infrastructure design must be supported by a sustainable management regime. It is unclear what is meant by this. Furthermore, it is unclear if there is a policy requirement for such a request in respect of all infrastructure. It is recommended that this is **deleted**. 3 Paragraph 7.17 (page 202) – Comments around all infrastructure being practical and manageable in the long term as to avoid creating an unsustainable management burden further supports the case that the FSA/NIA should not be publicly accessible. 4 Paragraph 7.18 (page 202) – The Housebuilders do not support the contention that they could be liable to pay financial contributions in relation to the ongoing maintenance of Finch Woods. 5 Paragraph 7.21 (page 203) – At this stage it is envisaged that the Housebuilders will each submit a single planning application relating	this. Point 2: This simply refers to the need to ensure that infrastructure is able to be maintained in perpetuity. Further clarification can be added to this to make the Council's intention clear. Point 3: We do not see the link between these points. Acknowledging and accounting for public access to the FSA/NIA (which as we note is somewhat inevitable) will allow for long term implications to be adequately planned for. Point 4: This is in line with the Council's Developer Contributions SPD. (Page 23) therefore we do not consider that any changes will be necessary. Point 5: Notwithstanding the housebuilders' position on this matter, our preference remains for a consolidated approach; which we consider will bring benefits to infrastructure planning processes, even if it is not ultimately reflected in the number of planning applications submitted. We want to continually encourage this approach. Therefore it would not be appropriate to remove		masterplan Various updates to the final masterplan reflecting the completion of deliverability and viability evidence.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		to their elements of the development. Contractually the Housebuilders would be unable to pursue a joint approach to the submission of planning applications and therefore paragraph 7.21 is unnecessary and should be **deleted**. 6 Page 204 (paragraph 7.22/table 7.3) – Further clarity is provided in respect of roof tax. What is the recognised build cost referenced. No evidence has been tabled that supports a roof tax or demonstrates that an approach would be appropriate and deliverable without adversely affecting viability. 7 Page 205 (paragraphs 7.23-7.25) – The high-level viability appraisal does not appear to have taken into account the majority of content of the draft Masterplan and has had no input from developers, or taken into consideration key costs associated with the following: A. Impacts of road widths/POS on density; B. House type provisions; C. Section 106 items; D. Materials Specifications; or, E. Highway contributions. It is therefore considered to be dramatically premature to put a figure in	this content. Point 6/7: We acknowledge that the Masterplan needs to be supported by robust evidence in relation to deliverability and viability, including to support the roof tax elements. This evidence is available to support the final Masterplan.		

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		at this stage and the Housebuilders have disregarded this. Further information and clarity from the Council in respect of work currently being undertaken by Keppie Massie would be welcomed at the earliest opportunity.			
Lichfields	3.141	It is stated at paragraph 7.26 (page 206) that; *any planning application received in advance of this Masterplan being finalised and approved will be considered premature*. This is completely contradictory to Policy SUE2 of the KLPCS which states in relation to Masterplans associated with the SUE sites that; *The master plan should accord with development plan policy and any associated Supplementary Planning Document and* ***may be submitted prior to or with the application*** (Lichfields emphasis). This statement is clearly contrary to planning policy and should be **deleted**.	We acknowledge the content of policy SUE2, however we consider this was written for the circumstance in which the developer is preparing the masterplan, hence allowing for concurrent preparation of both masterplan and planning application. This is patently not the case of East of Halewood, where the Council is preparing the masterplan, hence the second element – i.e. that masterplans may be submitted with an application – cannot apply here. Notwithstanding the above, this section of the draft masterplan was written specifically for instances where applications could be submitted prior to the masterplan being finalised. In the final masterplan, which will be published as an approved version, this text will not be necessary.	No	Final masterplan removes this text as it is no longer relevant in the final version of the document.
Lichfields	3.142	Paragraph 7.30 states that; *each applicant will need to prepare a detailed EIA for their red line boundary, and a*	The guidance with respect to EIA is consistent with legal advice received as to how to approach this issue for	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		high-level EIA covering the whole of the East of Halewood site, assuming it would be completed in accordance with this Masterplan. This statement is completely contradictory to the aspiration to achieve a comprehensive development. The Housebuilders have prepared a single EIA that covers the entirety of Plots 1 to 5. This approach has already been agreed and accepted by the Council via the EIA Scoping process. As such, paragraph 7.30 should be **deleted**.	large sites, which are likely to be delivered by different developers. We very much welcome that the housebuilders have prepared a single EIA covering the parcels under their control; however, there are parts of the site outside of plots 1-5, which will need to be considered. This is consistent with the advice given to the housebuilders through the EIA scoping process. The content of the masterplan therefore remains relevant.		
Lichfields	3.143	The preliminary planning application validation requirements list (page 207) includes a requirement to provide an Equality and Diversity Impact Assessment [EDIA]. However, the local validation checklist (Adopted 6th February 2019) states that an EDIA is required for; *applications that relate to physical changes to places of employment including community facilities and public buildings where a Design and Access Statement is not required.* Therefore, it is unclear why this is required in relation to planning applications for residential development and the requirement for EDIA's should be **deleted**.	We contend that an Equality and Diversity Impact Assessment (EDIA) is required to be submitted as part of any planning application submitted. If the applicant wishes to include the information required by an EDIA within a Design and Access Statement then this is an acceptable route, but this must be made clear. The information that must be provided is contained within the validation checklist.	No	Clarification added to the checklist in this regard.
Lichfields	3.144	Likewise, the list also includes a Health Impact Assessment, but this is not a	The requirement for a (HIA) is contained within Knowsley Local	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		policy requirement or part of the Councils validation checklist as an absolute requirement. This reference should therefore be **deleted**.	Plan Core Strategy CS2 and is also within the validation checklist. The reference to the submission of a HIA should not be deleted.		
	Appendices (08)				
Lichfields	3.145	As specified previously, the Housebuilders preference would be for the planting schedules contained within the appendices to be **deleted** as it is too prescriptive for a Masterplan. It is considered that it would be more appropriate for suitable species and planting regimes to be determined by the Housebuilders ecologist/landscape architect in consultation with their counterparts within the Council in due course.	Please refer to our earlier comments on this matter. We do not consider that the approach taken here is unduly restrictive; there is plenty of flexibility within the range of species identified for each character area.	No	No
	Draft Supplementary Planning Document				
Lichfields	4.1 and 4.2	The draft SPD has been prepared by the Council. Policy SUE2 of the KLPCS states that SPD's will be produced in relation to certain of the allocated SUE sites. The Council indicate that the SPD is intended to expand on the requirements of Policies SUE2 and SUE2b, as well as identifying and linking with the other policies of the KLPCS. The draft SPD proposes a number of "policies" relating to the East Halewood SUE. The Planning Practice Guidance [PPG] defines an SPD as follows:	Noted. The Council is fully aware of this guidance and legislation. We have deliberately avoided reference to "policies" within the SPD – key content is provided in referenced boxes "EH1", etc.	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		"Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. ***As they do not form part of the development plan, they cannot introduce new planning policies into the development plan****. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development." [Paragraph: 008 Reference ID: 61-008-20190315]* The Town and Country Planning (Local Planning) (England) Regulations 2012 goes on to state that any "policies" contained within an SPD must not conflict with the adopted development plan [Part 4 - 8(3)]. As such, whilst an SPD can provide additional guidance to assist applicants with the interpretation of policies contained within the adopted development plan, an SPD cannot introduce new planning policies or requirements that do not align with the adopted development plan. It is therefore important to consider the draft policies contained within the SPD in this context. The SPD should not therefore introduce new burdens or requirements or provide a basis for the Masterplan to seek to do so.			

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
Lichfields	4.3	Furthermore, it is worth reiterating that the Masterplan provides a very long and comprehensive document. There is significant repetition between the SPD and the draft Masterplan. The value of the SPD as a freestanding document in this context is limited and the role of the two documents should be much more clearly defined.	The Local Plan envisaged two documents being prepared for this site. We consider that there is a distinct role for the two documents; the SPD setting the general parameters for the development of the site, in accordance with the Local Plan, while the masterplan sets a more detailed framework and design guidance, providing increased certainty for the Council, stakeholders, residents and developers alike.	No	No
Lichfields	4.5	Section 1 provides an introduction to the site and the context within which the SPD should be read. The language of this section needs to be carefully considered and reviewed. The SPD is a guidance document and is not setting out law or policy. This should be made clear in the wording of this section. For example, at 1.6 it suggests that Masterplan must accord with the SPD. However, this is not strictly true as the Masterplan should accord with the KLPCS as the Development Plan unless material considerations indicate otherwise. It should also have regard to the SPD but there is no test of strict conformity to what is only a guidance document.	The status of the SPD is already made clear. Local Plan Policy SUE2 clearly states that the masterplan should accord with development plan policy and any associated SPD.	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
Lichfields	4.6	At paragraph 1.10 reference is made to engagement and the issue of balancing aspirations and objectives need to be read in the context of the foregoing. It is also noted that deliverability remains a key issue and to date no comprehensive viability information has been provided to underpin the SPD and draft Masterplan.	Noted – please see our earlier response on this matter in relation to the masterplan.	No	No
Lichfields	4.7	At 1.19 the SPD confirms the Council will review the HRA and SEA screening documents and such a review should have regard to the most recent case law, specifically on HRA.	Noted	The final SPD will reflect that these assessments have been updated to accompany the final SPD.	No
Lichfields	4.8	At 1.20 the SPD alludes to the fact that a Health Impact Assessment may be required but this is not a policy requirement or part of the Councils validation checklist as an absolute requirement. This reference should therefore be omitted.	Reference to Health Impact Assessment is appropriate here (see Local Plan Policy CS2); it is not mandated, the SPD just notes that developers should consider the need to carry out assessments.	No	No
Lichfields	4.9	Section 2 provides a further introduction and cross references the Masterplan but does not update it on the basis of the content thereof. Paragraph 2.3 for example should be revisited in the light of the current draft and subsequent final Masterplan.	Noted – however this SPD must stand the test of time and should not refer to a definitive masterplan of a particular date.	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	Vision and Objectives				
Lichfields	4.10 and 4.11	Paragraph 2.7 suggests that the site "will demonstrate excellence in quality of design, construction, environmental standards and public realm". However, this suggests the development will exceed policy requirements and current standards, and there is nothing within the KLPCS that requires this. For example, Policy SUE2 indicates the development should be of a high design quality. Use of language like excellence is misleading and suggests a higher bar than is found in Policy. This language should be reconsidered to align with the language used in policy. This is equally true of construction issues, environmental standards and public realm. This is a fundamental issue as the Masterplan strives for excellence and includes a level of detail and specification that goes way beyond what can be supported by Policy or evidenced as deliverable.	As per our response on a similar point made within comments on the draft Masterplan, we do not consider that the term "excellence" is problematic in this context – this is a vision statement, which is by its nature aspirational. We disagree that this implies an exceedance of policy requirements, as set out in the Local Plan, and draft SPD and Masterplan.	No	No
Lichfields	4.12	Paragraph 2.12 indicates a desire to rebalance the housing market in Halewood but provides no evidence of explanation as to what this means, and then goes on to indicate the need to provide a full range of housing typologies. The need for a market led	Rebalancing the housing market is a principle found in the Local Plan, and also in the Council's adopted Housing Strategy. A shortage of larger homes in Halewood, as elsewhere in Knowsley, in comparison with regional and	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		approach is supported as is a wide range of typologies. The focus should be on the provision of high-quality market housing focused on the family housing and this should be more fully explained within the text. It should not be for an applicant to justify a specific mix when the requirement for an alternative mix has not be justified.	national averages, is recognised. The requirement for affordable housing is also well founded in policy. There is sufficient flexibility here for a wide range of house types to be delivered, which accords with our understanding of the Housebuilder's proposals. We do not consider that there is any need to change the development objective for the site in this regard.		
	EH1: Vision and Objectives				
Lichfields	4.13	Draft Policy EH1 requires the East of Halewood masterplan and subsequent development proposals to demonstrate how they deliver the strategic objectives set out in the Vision and Development Objectives for the site set out at paragraphs 2.7 to 2.13 of the SPD. We have set out comments on the vision and objectives above which should be amended to ensure compliance with the KLPCS and to provide clarity. The vision and objectives set out within the SPD are considered to conflict with the adopted policies of the KLPCS. Policy EH1 in itself should also be amended to reflect the status of the document as guidance. It therefore should not require absolute compliance but cognisance of the vision and objectives. Therefore, the word "must"	We do not agree with the arguments put forward here; we consider that the status of the SPD has been clearly stated at the beginning of the document. Policy SUE2 states that site specific SPDs will set out details of development and infrastructure requirements. We do not consider that EH1's requirement that proposals demonstrate how they deliver the vision and strategic objectives is problematic.	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		should be replaced with “should” and “demonstrate how they deliver” should be changed to “have regard to”. We object to the current wording of Policy EH1 in the strongest possible terms.			
	Constraints and opportunities				
Lichfields	4.14	Paragraph 2.15 identifies that Figure 2.1 identifies constraints and opportunities that are referred to in Policy SUE2 and SUE2b, but these are not all specifically identified and referred to in that Policy. The language of this paragraph should be amended to make this clear. It is equally unclear why this figure is necessary when constraints and opportunities are dealt with in great detail in the Masterplan.	We are happy to clarify that the identification of constraints has come from the Local Plan content and other sources. We do consider this figure is necessary within the SPD, to illustrate the high level constraints and opportunities identified in the SPD text.	Paragraph 2.15 updated to reflect that constraints and opportunities have been identified from the Local Plan content and other evidence.	No
Lichfields	4.15	The SPD should make it clear what the committed development at Finch Farm is and its purpose as well as how it relates to the SUE and how they have had regard to the SUE in considering those applications. The third bullet or paragraph 2.16 should be expanded to provide this detail.	This detail is not necessary for the SPD; however as noted above, the final Masterplan will need to clarify the role of the EFC pitches, and the requirement for contributions towards outdoor sports in Halewood.	No	As noted above.
Lichfields	4.16	Furthermore, the presentation of information on Figure 2.1 is unclear. For example, urban greenspace and priority habitats and local wildlife sites are both interchangeable and used indiscriminately. It also contradicts the	We are happy to update Figure 2.1 to address these points, and to ensure better alignment with the constraints identified in the Local Plan and evidence collected to date.	Updated Figure 2.1 included in final SPD.	

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		subsequent Masterplan in terms of opportunities. This diagram should be reviewed and either omitted or simply address designated constraints. For example, the purpose and rationale for "key pedestrian / cycle demand" is unclear and not addressed in the text.			
	Policy Context				
Lichfields	4.17	Paragraph 3.2 should be updated to reflect the most recent National Planning Policy Framework.	Noted and agreed.	Paragraph 3.2 will refer to NPPF 2019 update.	No
	EH2: East of Halewood Masterplan				
Lichfields	4.18	Draft Policy EH2 sets out details in respect of the East of Halewood Masterplan. It is noted that Criterion 2 states that a Masterplan can be prepared (alone or jointly) by the Council, developers or landowners and thus there is no policy requirement for this process to be led by the Council.	Noted. As Lichfields are aware, the landowners/housebuilders had the opportunity to prepare a masterplan following adoption of the Local Plan but failed to do so; hence, the Council stepped in to prepare a masterplan.	No	No
Lichfields	4.19	Criterion 3 sets out the technical reports that will accompany the masterplan. However, the document has been accompanied by a single baseline report rather than a series of technical reports. This criterion should be updated to reflect this fact.	Agreed, this paragraph can refer to technical evidence rather than reports per se.	EH2 bullet 3 updated to refer to "technical evidence" rather than "technical reports".	No
Lichfields	4.20 and 4.21	Criterion 5 regards phasing and states that; *planning applications will demonstrate how the phasing and*	As noted in response to a similar point being made within the Masterplan response, we disagree	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		sequencing of development will be facilitated across the entire site in a way which supports and secures the comprehensive development of the site. However, whilst both Policies SUE2 or SUE2b support the comprehensive development of the site, neither policy explicitly requires information to be provided in respect of phasing. The Housebuilders envisage that their respective developments can be delivered simultaneously. Whilst each housebuilder will provide details of their proposed approach to phasing the delivery of their own parcels, there are not envisaged to be any infrastructure requirements that require a SUE wide approach to phasing to be taken. The development will be phased naturally with different housebuilders commencing development simultaneously. This approach will not restrict the comprehensive development of the SUE and therefore fully accords with the KLPCS. On this basis, we do not consider Criterion 5 to be necessary or accord with the requirements of the adopted development plan and therefore it should be **deleted**.	with this point – while we do not anticipate that a prescribed phasing of parcels coming forward for development will be necessary, we do consider that the delivery of physical infrastructure will need coordination in terms of timing of delivery – hence "phasing" is an appropriate word to describe this. We therefore do not consider that EH2 need to be amended.		
	EH3 Development Parameters				

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
Lichfields	4.22 and 4.23	Draft Policy EH3 regards development parameters which are set out in the supporting Table 4.1. The supporting text conflicts with the table. Paragraph 4.3 uses the term benchmark, but the reality is that it is guidance based upon an envisaged scenario. It is not a minimum and should not be specified as such. The term "benchmark" should be replaced with "guide". Paragraph 4.4 indicates the requirements have been calculated on the basis of 1,100 dwellings and yet Table 4.1 refers to 1,500 dwellings. The basis of any calculation should be clear and consistent in the text. Paragraph 4.5 is noted and confirms that any figures quoted (including in Table 4.1) should not be expressed as minimum requirements but guidance.	We consider the term benchmark is appropriate, allowing for the requisite flexibility for the masterplan and development proposals to respond to. Mistake in paragraph 4.4. needs to be corrected to refer to maximum of 1,500 homes.	Mistake in paragraph 4.4. is corrected to be consistent with the table 4.1.	No
Lichfields	4.24	Paragraph 4.7 refers to shops, education and healthcare being delivered off site through developer contributions. Firstly, we can see no basis for shops to be delivered by developer contributions, and secondly the evidence of funding and the requirement for contributions is not provided within the SPD. The text should be amended to refer to market funding, grants, other funding streams and only where necessary developer	Agreed that the reference to shops should be removed from paragraph 4.7. However, the requirement for contributions towards education and health care is in accordance with the Local Plan and also the Developer Contributions SPD and therefore is appropriate for inclusion here.	Removed reference to shops from 4.7.	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		contributions.			
Lichfields	4.25	The Housebuilders have the following comments on Table 4.1: 1 Public Open Space – it is stated that a minimum of 16 hectares of the site area is POS which equates to approximately 20% of the site area. Firstly, the term minimum should be removed as set out above and to have cognisance to paragraph 4.5. Secondly, this suggests that the entire POS provision will be provided on site, including outdoor sports. It is our understanding that any contributions to outdoor sports provision (yet to be agreed) will be provided as off-site financial contributions. In addition, this figure appears to assume that the FSA/NIA will form part of the sites POS. We understand that the Council will be providing additional information in respect of POS provision and we will comment further in due course. 2 Flood Risk Mitigation – States that 9.1 hectares is required for Flood Mitigation. However, the FSA is approximately 7.8 hectares, so this should be amended. This figure should not be included as part of	Point 1: With respect to public open space, there is sufficient flexibility that “most forms” of open space will be provided on site. We are happy to add a reference to the use of developer contributions for outdoor sports, and separate this item out from general POS to be provided on site. Point 2: this area is based on EA mapping, which is appropriate for the SPD; the masterplan proposes the detail of the engineering works for the FSA (not the SPD). We are happy to clarity that for the purposes of the SPD, we can remove reference to the function of the flood risk mitigation space, to be picked up in the masterplan. Please see our previous comments regarding our commitment for the Masterplan to clarify the role of the FSA with respect to its potential POS function. Point 3: We were trying to specify that the emerging requirements are for primary and early years / chlildcare rather than say secondary or SEND provision. However we are happy to refer to education contributions generally here,	Table 4.1 updated to: - Clarify outdoor sports likely to be delivered through developer contribution off site - Focus the land use references for flood risk mitigation on this purpose only. - Refer to education contributions generally rather than specifying primary and early years categories.	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		the POS requirement and the use of this land should not be specifically assumed as it may legitimately remain in agricultural or other use. There is no evidence of basis to seek to control the use of this land at this time. 3 Education Health – It is stated that the Council will require contributions for the improvement of local primary and early years education. The key guidance contained within the Developer Contributions SPD (2016) states that provision for early years is encompassed within wider education provisions (page 33). Therefore, it is unclear why this is specified as a separate contribution. Reference to it should therefore be **deleted**. The Housebuilders await additional information in respect of education and health contributions and will comment further in due course.	although we do not see that this will give the Housebuilders any benefit.		
Lichfields	4.26	In terms of Policy EH3 there is no flexibility in the wording and this should be amended to indicate that it is broadly consistent with the uses and quantum set out in Table 4.1. The Housebuilders have no other comments in respect of draft Policy EH3.	We consider that there is sufficient flexibility in Table 4.1 and its supporting text that this change is not necessary.	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
Lichfields	4.27	In terms of the Spatial Development Framework, which is illustrated in Figure 4.1, there is no key and no indication as to what the symbols mean. This includes the arrow to the north which implies public access to the land adjacent to Ditton Brook which cannot be justified in quantitative or land use terms. This diagram should be reviewed and updated or omitted in its entirety.	We note that a key should be included with this diagram. We do consider that this is a useful diagram, giving spatial expression to the land use breakdown described in section 4. Housebuilders will note the spatial elements are in broad accordance with the Masterplan.	Included a key within figure 4.1	No.
	EH4 Residential Development				
Lichfields	4.28 and 4.29	Draft Policy EH4 regards residential development. Criterion 3 states that; *a minimum of 25% affordable housing is required across the site in accordance with Core Strategy Policy CS15*. However, this statement is not consistent with Policy CS15 which simply states that the SUE sites should provide 25% affordable housing (subject to viability). As set out within the introduction, an SPD cannot introduce policies are requirements that are not consistent with the adopted development plan. Therefore, the words 'a minimum of' should be **deleted**. The Housebuilders have no further specific comments in respect of the wording of draft Policy EH4.	Policy CS15 does in fact refer to a minimum, direct quote as follows (our emphasis): *"Within all proposed market sector housing developments which have a capacity of 15 dwellings or more, a minimum provision of affordable housing will be sought as follows: 10% on sites within the current urban area; and 25% on sites identified as Sustainable Urban Extensions within Policies SUE1 to SUE2c. "* The policy then goes on to refer to set various additional factors, including relating to viability, etc. which also clearly applies in East of Halewood.	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
Lichfields	4.30	In terms of the supporting text, this addresses a number of matters that are not specifically addressed in Policy EH4, including the non-residential uses on land to the south of Higher Road. It is for the Council to decide the appropriateness of any uses and the policy compliance, so the Housebuilders have no specific comments on this section. However, it should be clear that if there is additional infrastructure requirements arising from non-residential uses then this should be borne entirely by those uses and not by the wider development.	The location potentially suitable for non-residential uses is contained to south of Higher Road; it is expected that this parcel can be self-sufficient in terms of on site infrastructure, such as highways access, utilities and drainage, however depending on use, the development of this parcel may need to make contributions to other site wide infrastructure such as off site highways improvements, outdoor sports, education and health care.	No	No
Lichfields	4.31	In terms of education and healthcare the text should not prejudge the need for a requirement unless it contains specific evidence that demonstrates such a requirement is absolutely necessary. Such evidence has not been forthcoming. Therefore, the text should be amended to indicate such contribution may be required, or are likely to be required, and not that they "will". Whether or not these are the full contributions set out in the Developer Contributions SPD or partial ones will depend upon capacity analysis as well as exploring other funding opportunities as well as analysis of the works that are necessary to mitigate the impacts. At present this is not known so the wording	The SPD flags that based on current evidence at the time of drafting, that existing education and health care facilities are not able to cater for the increased population arising from the East of Halewood development. Further details are provided in the masterplan.	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		should be flexible to reflect this fact.			
	EH5 Public Open Space				
Lichfields	4.32 and 4.33	Draft Policy EH5 regards POS. Paragraph 4.26 of the supporting text states that; *the actual POS and outdoor sport requirements for the East of Halewood SUE will be established when a detailed open space proposal is put forward within the site wide masterplan, and then planning applications.* We understand that the Council will be providing additional information in respect of POS provision and we will comment further in due course. However, we see no reason why some analysis of walking distances and existing open space provision should not be provided to underpin the SPD. This information should be included within the SPD.	We consider that the Masterplan is the appropriate document to deal with the detail of POS to be provided.	No	No
Lichfields	4.34	In addition, Table 4.2 should be amended to make it clear that the figures quoted are per person. It should also explain how this is translated into the actual requirement (the Developer Contributions SPD uses the number of bedrooms plus 1 to estimate the average occupancy of any one dwelling).	Paragraph 4.24 explains that Table 4.2 quotes figures per resident, but this can be added to the table if this would be useful. The calculation behind the translation of these standards, through the approximate number of dwellings, is within the Developer Contributions SPD. Further details is provided in the Masterplan.	Add “per resident” to Table 4.2 title.	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
Lichfields	4.35 and 4.36	Paragraph 4.29 lists a number of existing open spaces both in and off the site. Bullets 3-5 state that there are potentially opportunities for improvements to be made at off-site locations including; Halewood Leisure Centre, New Hutte Woods and Court Farm Woods. There is no policy requirement or technical evidence to support the provision of mitigation/improvements at these off-site locations as part of the development proposals at East Halewood. Furthermore, there is no reference to this in the draft Masterplan. Therefore, bullets 3-5 of paragraph 4.29 should be **deleted**. The only one of these bullets that may be relevant is that relating to Halewood Leisure Centre if it can be demonstrated that this is how the need for sports pitches arising from the development will be met. As set out above we have reservations regarding the evidence around this and how needs may well be met by community provision at the Everton training ground. However, if the needs arising from the development are to be met here then a specific costed scheme should be used as the basis for any contribution and not the SPD.	We accept that bullets 4 and 5 could be deleted, as there is no evidence that the POS requirements cannot be met on the site (with the exception of outdoor sports, hence it is appropriate to keep bullet 3 relating to Halewood Leisure Centre).	Delete bullets 4 and 5 of 4.29.	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
Lichfields	4.37	In terms of the policy itself, in order to comply with the requirements of the KLPCS and Developer Contributions SPD the word minimum should be removed at the start of criterion 1. It is also considered that the final sentence of criterion 1 should be updated to state: *"The final spatial extent, distribution and form of open spaces within the site will be agreed with the Council as part of the masterplanning* ***and planning application*** *process."*	Agree to proposed changes. The Council accepts that while the masterplan process will set the framework for most provision of POS within the site, there will be some flexibility in some areas, meaning that the final spatial extent can only be agreed at the planning application stage.	Remove "minimum" and add "and planning application process" to EH5 bullet 1.	No
	EH6 Access				
Lichfields	4.38	In paragraph 4.31 the Housebuilders can confirm that access onto Finch Lane is not possible due to the presence of rising mains and high voltage cables. There is a typographical error in the text with a superfluous "it" in the last line. The desire to create a built environment that is not dominated by highways (paragraph 4.34) is noted and supported, and this should be reflected in the Masterplan.	Noted, and typo to be corrected.	Remove "it" from last sentence of this paragraph.	
Lichfields	4.39, 4.40 and 4.41	In respect of draft Policy EH6, Criterion 1 states that; *locations for road access points will be established through the masterplanning process*. Neither policy SUE2 or SUE2b explicitly requires these matters to be established through the masterplan process. Furthermore, the	We do consider that the masterplan needs to be fairly firm in its identification of access points to the site; as well as the form of junctions to be provided, the suggested change allows for too much flexibility. We do accept that some detailed	Change EH6 bullet 1 as follows: Locations <u>and general form</u> of road access	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		access locations are supported by technical evidence set out within the transport. The policy should therefore be updated to acknowledge that locations for road access points will be established through the masterplan or planning application process. It is considered that the text should be amended as follows: *"Broad locations for road access points will be established through the masterplanning process the detailed design of which will be confirmed at application stage. These must…."* The Housebuilders have no further comments in respect of draft Policy EH6.	design will only be fixed at the application stage, hence a change to the text can accommodate this.	points will be established through the masterplanning process, and these must lead to a legible and attractive network within the site. Final detailed design will be agreed at the planning application stage…"	
	EH7 Utilities and Services				
Lichfields	4.42	Draft Policy EH7 regards utilities and services. The Housebuilders have the following comments: 1 Criterion 2 should be amended to state; *unless otherwise agreed with the Council and**/or** United Utilities*. Not all drainage will necessarily need the approval of UU such as SUDS. 2 Criterion 4 regards the COMAH outer zone which covers part of the site. It is stated that development proposals should respond to the	Point 1: consider a change to say "and where appropriate, United Utilities" is more suitable – otherwise this implies that UU can approve instead of the Council. Point 2: Noted, no change considered necessary.	Change EH7 point 1 to "unless otherwise agreed with the Council, and where appropriate, United Utilities…"	

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		part of the site lying within the COMAH outer zone and references the fact that schools, nurseries or residential institutions with a site area greater than 1.4 hectares may not be built in this part of the site. However, none of these development types are actually proposed as part of the Masterplan and therefore this is not considered to be necessary. Notwithstanding this, the Housebuilders do not actually object to its inclusion.			
	EH8 Design Principles				
Lichfields	4.43	Draft Policy EH8 regards development and design principles. At paragraph 5.5 of the supporting text, it is assumed that the first sentence is meant to read as; *Although the layout of the residential development area will **not** be established in detail through the preparation of the masterplan*. Likewise, should the increase in densities mentioned in the third sentence not state from east to west rather than north to south in accordance with the proposed Character Areas.	Agree first sentence is not clear and will be revised in the final SPD. With respect to densities, the east-west change should be noted, but the Housebuilders have also previously supported a lower density north of the railway line – the text can be changed to reflect this.	Deleted first sentence of 5.5. Added reference to decreasing density west-east.	
Lichfields	4,44	Criterion 6 of EH8 refers to a design framework and references a design code but provides no basis of how this will be demonstrated and why it is necessary. It is considered that the right	As previously noted, the Council remains committed to the provision of design guidance for the site, which is fulfilled by the Masterplan design guide section. We do not consider it	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		place to do this is within the Design and Access Statements that will support individual applications which will justify the approach taken. On this basis criterion 6 should be amended to state: *"All planning applications should be accompanied by Design and Access Statements which set out principles for key places within the site – such as gateways and main streets – demonstrating a coherent sense of place and embed local distinctiveness."*	appropriate to leave this to the planning application stage. We have however been clear that this part of the masterplan document does not set fixed parameters, but rather sets out a flexible guide which developers should respond to through planning applications.		
Lichfields	4.45	In respect of comments at paragraph 5.10 of the supporting text and criterion 8 of draft Policy EH8, the Housebuilders would welcome clarity in respect of the proposed independent design review process. However, there is no policy basis exists to support this requirement. The KLPCS does not set out a requirement that proposals relating to the allocated SUE sites should be subject to an independent design review, nor does any such national requirement exist. On this basis, draft Policy EH8 does not accord with the provisions of the KLPCS. Furthermore, an SPD cannot be used as a mechanism to introduce new policy requirements. Therefore, the requirement for an independent design review process should be **deleted**.	While there is no Local Plan policy requirement for design review, the Council considers this is a beneficial process for all and therefore we strongly support it being undertaken at the masterplan and application stage; indeed, a consistent design review panel for East of Halewood has been established with Places Matter. We can change criterion 8 to "the Council's strongly encourages independent design review…. " to reflect that this is not an absolute requirement.	EH8 bullet 8 to read "The Council strongly encourages independent design review…. "	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	EH9 Streets, Paths and Movement				
Lichfields	4.46	There is a typographical error in the second sentence of paragraph 5.12 of the supporting text (in respect of the word however). Criterion 3 of the draft policy states that proposals should ensure pedestrian and cycle connectivity and **equestrian routes where appropriate**. There is no reference to a requirement for equestrian routes within the Policies SUE2 or SUE2b of the KLPCS. Furthermore, the draft Masterplan does not elaborate on this matter and this is not something that has been discussed with the Housebuilders previously. There is no basis or evidence of a specific need for equestrian routes. It is therefore considered that this reference should be removed.	Typo will be corrected. Agree reference to equestrian routes can be removed. Further advice from highways authority, and following further refinements to the masterplan, these would not be appropriate to include within the East of Halewood site.	Corrected typo in 5.12 Removed reference to equestrian routes within EH9 bullet 3.	No
Lichfields	4.47 and 4.48	With regards to Criterion 4, the scope and extent of off-site highways works and public transport infrastructure is yet to be agreed and is subject to ongoing negotiations. It is not considered that the Masterplan will be accompanied by sufficient technical work to identify the precise scope and extent of the off-site works. The Masterplan identifies a range of junctions and nodes where the need for improvement should be explored. It does not define with any precision the	We acknowledge that further evidence is needed to support the identification of highways improvements, as well as details of the timing and method of their delivery. We have continued work towards finalising this evidence, on which we will be seeking further input from the housebuilders, and which will be available to support the final Masterplan.	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		nature and scope of the actual works and nor should it. It is therefore considered that the wording of Criterion 4 should be updated as follows: "*Developers will be required to contribute to the necessary off-site works and public transport infrastructure* ***to be identified and agreed as part of the transport assessment process****.* ***This will*** *enable accessibility to the site and* ***provide appropriate mitigation in respect of*** *highways impacts arising from the development."*	We therefore do not consider that the proposed change is appropriate.		
	EH10 Landscape and Ecology				
Lichfields	4.49	Paragraph 5.18 should be **deleted** as it has been superseded by events.	Agreed.	Deleted paragraph 5.18	No
Lichfields	4.50	Draft Policy EH10 regards landscape and ecology. Paragraph 5.17 refers to landscape buffers along the railway boundaries and the Ditton Brook. In respect of a landscape boundary along the Ditton Brook, it is unclear as to whether such a proposal would affect the FSA's ability to function and any such proposal should be considered and agreed as part of the detailed design of the FSA. It is therefore requested that reference to a landscape buffer along the Ditton Brook is **deleted**.	It is clear that the final proposals for the Ditton Brook corridor, notwithstanding the proposals for the FSA, will need to account for appropriate ecology mitigation commensurate with the corridor's designation as a NIA. A change to clarify this within 5.17 is appropriate.	Changed paragraph 5.17 to read: "Appropriate ecological mitigation and/or landscape buffers along the railway lines and Ditton Brook corridor… "	No
Lichfields	4.51	In terms of criterion 2 this suggests that	Agreed, proposed changes to bullet	Changed EH10,	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		all ditches should be enhanced as semi-natural habitats. This may not be possible where such a requirement could affect the functionality of the ditch. The requirement should be qualified to be "were appropriate".	2.	bullet 2: "<u>where possible</u>, the network of drainage ditches and bank side habitats and woodlands should be retained and enhanced as semi natural habitats."	
Lichfields	4.52 and 4.53	Criterion 3 appears to include superfluous words and "Water management" should be **<u>deleted</u>** from the second sentence. The Housebuilders have no further comments in respect of draft Policy EH10.	Typo will be corrected, remove water management.	Corrected typo in EH10, bullet 3	No
	EH11 Development Sustainability				
Lichfields	4.54	EH11 should be amended to indicate that "Development proposals should have regard to: …" and not require their inclusion. There is no Policy basis within the KLPCS to require their inclusion and the policy should therefore encourage rather than require. The Housebuilders have no other comments in respect of draft Policy EH11 but would clarify that there are limited opportunities for reusing materials for development at East Halewood.	Policy CS22 within the Local Plan provides a basis for requirements around sustainable construction and energy efficiency. The Waste Local Plan provides the policy basis for reuse of materials, where possible. Finally the electric vehicle charging point element reflects the adopted New Residential Development SPD. We do not consider that there is any merit in changing the section as requested.	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	EH12 Planning Application requirements				
Lichfields	4.55 and 4.56	Draft Policy EH12 addresses planning application requirements but the supporting text provides a wider commentary of phasing and the need for comprehensiveness. Paragraph 6.8 of the supporting text advises that it is the Council's preference for full planning applications to be submitted in light of the certainty afforded by a Local Plan allocation and Masterplan/SPD being in place. Whilst this is noted, given the scale of proposals, it may be prudent for Housebuilders to submit elements of their proposals in outline in order to retain the flexibility to consider the current housing market when bringing forwards later phases. There is no basis to require a full application, and the justification provided by the Council in the text gives no basis for such a requirement. Although it is noted that it is only a preference and not a requirement the inclusion of this paragraph suggests otherwise. Likewise, there is no basis to require pre-application engagement, although the Housebuilders accept it may be beneficial. Therefore, this reference to these as suggestions must be removed and the paragraph **deleted**.	We do not consider there is any justification for removal of this content, which is about stating the Council's preferences rather than requirements.	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
Lichfields	4.57 and 4.58	In respect of paragraph 6.10 of the supporting text, the Housebuilders have accepted that their collective proposals at East Halewood constitute EIA development and have prepared an EIA, the scope of which has been agreed with the Council. Paragraph 6.10 states that each applicant will need to prepare a detailed EIA for their red line boundary and a high-level EIA for the whole site. This is simply incorrect and has no basis in the associated Regulations. It also does not reflect the approach taken by the Housebuilders who have prepared one single EIA covering their collective developments. In any case, this approach has already been agreed with the Council. A single EIA shows that the Housebuilders have considered their developments in a comprehensive manner as opposed to the piecemeal approach currently set out within the text. On this basis, the reference should be updated to reflect the current situation or removed in its entirety.	The guidance with respect to EIA is consistent with legal advice received as to how to approach this issue for large sites, which are likely to be delivered by different developers. We very much welcome that the housebuilders have prepared a single EIA covering the parcels under their control; however, there are parts of the site outside of plots 1-5, which will need to be considered. This is consistent with the advice given to the housebuilders through the EIA scoping process. The content of the SPD therefore remains relevant.	No	No
Lichfields	4.59	Criterion 1 of EH12 requires that planning applications accord with the Masterplan and SPD. However, this goes beyond the role of an SPD as a guidance document. Elsewhere in the SPD the Council accept that variation from the SPD and Masterplan can be	This wording can be replaced to reflect the exact wording of the Local Plan, with respect to the relationship between planning applications and the masterplan and SPD. We consider the proposed wording weakens the SPD and does not	EH12 bullet 1 reworded to read: “Proposals for development within the East of Halewood site will	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		justified. It is for an application to justify any one approach. It is also not possible to require planning applications to accord with an "approved" masterplan which the SPD accepts can be submitted alongside the application and considered (and thus approved) at the same time. This criterion must therefore be **deleted** or amended along the lines of: *"Planning applications should demonstrate how they have regard to the masterplan and this SPD."*	appropriately reflect adopted policy. Policy SUE2 was written for the circumstance in which the developer is preparing the masterplan, hence allowing for concurrent preparation of both masterplan and planning application. This is patently not the case of East of Halewood, where the Council is preparing the masterplan, hence the second element – i.e. that masterplans may be submitted with an application – can no longer apply here.	only be granted planning permission where they are consistent with a single detailed masterplan for the site, approved by the Council. The masterplan will in turn need to accord with development plan policy and this SPD".	
Lichfields	4.60 and 4.61	Criterion 2 of draft Policy EH12 states that planning applications will demonstrate how phasing and sequencing of development will be facilitated across the entire SUE, securing the comprehensive development of the whole site. Whilst each housebuilder will provide details of their proposed approach to phasing the delivery of their own parcels, there are not envisaged to be any infrastructure requirements that require a SUE wide approach to phasing to be taken. The development will be phased naturally with different Housebuilders commencing development simultaneously. This approach will not restrict the comprehensive development	As noted in response to a similar point being made within the Masterplan response, we disagree with this point – while we do not anticipate that a prescribed phasing of parcels coming forward for development will be necessary, we do consider that the delivery of physical infrastructure will need coordination in terms of timing of delivery in order to achieve comprehensive development – hence "phasing" is an appropriate word to describe this. We therefore don't agree that any change is needed to EH12 in this regard.	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		of the SUE. It is therefore considered that Criterion 2 is updated to state: *"Planning applications will demonstrate that the delivery of the specific proposals will not prejudice the overall phasing and delivery of the wider SUE site."*			
	EH13 Infrastructure Requirements				
Lichfields	4.62 – 4.67	Draft Policy EH13 regards the provision of infrastructure. It is noted that Criterion 2 requires the Masterplan to be accompanied by a viability appraisal. No such viability appraisal has been made available and therefore the implications of the requirements of the draft Masterplan cannot be tested. The Council who has prepared the draft Masterplan has therefore not complied with the requirements of the SPD. Whilst the Housebuilders support the caveats set out within the supporting text (paragraphs 6.11-6.17) in respect of viability, we understand that to date, only limited consideration has been given to viability in respect of the draft Masterplan. Some commentary on viability, including residual land values for the various options is provided within the supporting Consultation Options Testing and Preferred Options Report.	We acknowledge that the Masterplan needs to be supported by robust evidence in relation to the developer contribution asks, deliverability and viability. We continue to work towards finalising this evidence, on which we will be seeking further input from the housebuilders, and which will be available to support the final Masterplan.	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		However, it is stated on page 56 (paragraph 7.7) that the assessments undertaken as part of this process were based only on the broad land use proposals identified, with no allowances made for abnormals, development costs of S106 contributions. Clearly these are the fundamental factors forming the basis of any viability appraisal. As such, no weight can be attributed to the viability work done to date. Therefore, at the current time, the draft Masterplan is not accompanied by a viability appraisal as required under Criterion 2 of draft Policy EH13 of the draft SPD. Furthermore, the Housebuilders have serious concerns in respect of the lack of evidence relating to the implications the proposals set out within the draft Masterplan may have on the viability of the development. Until such a time that this work has been completed, the emerging Masterplan cannot be considered to accord with the requirements of the draft SPD. The Housebuilders understand that work is ongoing and that Keppie Massie are currently considering the full implications of the draft Masterplan on viability with a view to preparing a robust assessment. The Housebuilders have not been			

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		involved in this process to although we understand that there will be an opportunity for us to comment further in respect of viability matters in due course when the work being pulled together by Keppie Massie is made available. The Housebuilders would like to reiterate that it is absolutely essential and fundamental to the delivery of the scheme that they are given the opportunity to review the technical information that has underpinned the draft Masterplan, including the viability appraisal. Criterion 1 states the masterplan will set out a coherent and co-ordinated approach to infrastructure, however our ability to test this is fettered by the fact there is no Infrastructure Delivery Plan as required by Criterion 2 and no assessment of viability. These criteria should be reviewed to set out obligations that are realistic and can actually be met. Currently they have not been.			
Lichfields	4.68	In respect of Criterion 3(b) this work is incomplete and therefore the reference to the masterplanning process should be amended to refer to the planning application process.	We acknowledge that further evidence is needed to support the identification of highways improvements – please see response on this matter in previous comments.	No	No
Lichfields	4.69	In respect of Criterion 3(e), the Housebuilders have prepared a	We consider this content is appropriate for an SPD, and is in	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		comprehensive drainage solution for the entire site, but the Council have to accept that in order for each parcel to be developable it needs to be independently drained. We have provided detailed comments in this regard in our response to the draft Masterplan. There are technical and other limitations in addition to the ownership and delivery constraints. Therefore, this criterion should be **deleted**.	accordance with sustainable drainage principles established in the Local Plan and national policy. The detail, as the Housebuilders are aware, has been worked through in a site specific Masterplan. Notwithstanding the above, in the development of the masterplan, we have tried to accommodate the housebuilders' aspirations for surface water drainage solutions, in order to facilitate deliverability of the site.		
Lichfields	4.70	In respect of Criterion 3(g) the evidence to support these requirements cannot be found within the SPD or supporting documents. Whilst it is accepted it is likely that there is some shortfall in education capacity, the nature of this and the availability of other funding has not been addressed. Similarly, the need for healthcare provision remains unquantified. The final part (iii) of this criterion the nature of these improvements are not evidenced discussed or defined anywhere in the SPD. This criterion should therefore be **deleted**.	The SPD flags that based on current evidence at the time of drafting, that existing education and health care facilities are not able to cater for the increased population arising from the East of Halewood development. We also understand from Merseytravel that there will be a need for new bus stops within the development. These items are within the scope of the Local Plan and adopted Developer Contributions SPD. The Council has finalised evidence and contributions within the final Masterplan.	No	No
	Conclusions				
Lichfields	5.1	In summary, the Housebuilders continue to support the ongoing	Noted and welcomed.	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		delivery of land to the east of Halewood for residential development and we support the preparation of a Masterplan and SPD in accordance with Policy SUE2 of the KLPCS.			
Lichfields	5.2	Whilst the Housebuilders do not object to the draft SPD in principle, we have identified a number of proposed requirements that are not consistent with the requirements of the KLPCS. On this basis, the document has not been prepared in accordance with national guidance. We would like to reiterate that an SPD does not form part of the development plan and therefore cannot introduce new policy requirements that are not required through the adopted plan. The document should be reviewed on this basis to ensure it is consistent with the KLPCS.	We have dealt with the various instances of this claim within our responses to detailed comments, above. Generally, we dispute that this document needs to be reviewed in this regard.	No	No
Lichfields	5.3	The Housebuilders have fundamental concerns with the draft Masterplan as currently proposed. Fundamentally, Policy SUE2 of the KLPCS requires the Masterplan to respond to the SPD and not vice versa. It is suggested that the SPD should set out the parameters to which the Masterplan should then accord. Whilst there is clearly ambiguity in how the phrase 'Masterplan' is interpreted, the phrasing	We consider that there is a distinct role for the two documents; the SPD setting the general parameters for the development of the site, in accordance with the Local Plan, while the masterplan sets a more detailed framework and design guidance, providing increased certainty for the Council, stakeholders, residents and developers alike.	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		suggests that a single detailed Masterplan refers to a single plan. What has been presented though is in fact an onerous document of considerable detail which appears to set mandatory requirements for the delivery of the site that are in some instances not mandated by the adopted policies of the KLPCS or the draft SPD.	Notwithstanding the areas of change agreed through response to representations, we do consider that in general, the masterplan provides an appropriate level of detail.		
Lichfields	5.4	Furthermore, the prescriptive and detailed nature of the design guidance is likely to have implications that will add significant abnormal costs to the scheme, above and beyond what is necessary to make the development acceptable. It is apparent that this has not yet been fully considered and there is a lack of evidence in respect of viability. This is a fundamental matter that will underpin the delivery of the wider East Halewood SUE and clarity on this matter is sought as a matter of urgency.	As previously noted, we do acknowledge that the Masterplan needs to be supported by robust evidence in relation to deliverability and viability.	No	No
Lichfields	5.5 and 5.6	We do not object to the principle of a Masterplan in itself, we just believe that the document presented in this instance oversteps the mark in terms of what is reasonably necessary or required by the provisions of Policy SUE2 of the KLPCS. We are concerned that it could potentially act as a barrier to delivery.	As previously noted, for a site of the scale of East of Halewood, it is beneficial to have in place design guidance that will deliver consistency and quality within the new development. This should be a helpful tool for all developers, giving practical and helpful guidance in order that they can deliver the high	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		Whilst our preference is for much draft Masterplan's content to be completely removed, at the very least the document should be heavily caveated as to allow the reader to differentiate between what are proven and justified requirements and what are merely aspirations that are not currently supported or justified by technical evidence.	quality development sought by the Council's policy framework for this important site. This approach aligns with best practice in planning for large residential developments. We have been clear that this part of the masterplan document does not set fixed parameters, but rather sets out a flexible code which developers should respond to through planning applications. Therefore we do not consider that is it is prescriptive or restrictive.		
Lichfields	5.7	The Housebuilders recognise and share the Council's aspirations to deliver an exemplary development at East Halewood as one of the borough's key strategic sites. However, a balance needs to be struck between what is aspirational and what is deliverable. The Housebuilders have participated in workshops where options and then a preferred option for the Masterplan itself were presented. However, they were not previously made aware of the significant level of detail and prescriptive requirements that would be set out within the supporting document. We would therefore welcome the opportunity to discuss our concerns further and agree an appropriate way forwards to ensure that the final	Noted and welcomed.	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		Masterplan is able to both meet the aspirations of the Council whilst ensuring that the development remains deliverable.			
Lichfields	5.8	The Housebuilders recognise that this is an evolving process and moving forwards are keen to work with the Council in close collaboration to secure a positive outcome that delivers for the current and future residents of Halewood	Noted and welcomed.	No	No
Cass Associates	**Key point 1**	When it comes to design and layout the guidance is too prescriptive. It is appropriate for the SPD and Masterplan to set out design aspirations and the expectation that the design approach should respond to the context of the SUE. However, there is excessive detail. This level of detail will inhibit the ability of the designer to make choices on the essential structure of new development and on many detailed components that will make it functional, efficient, viable and effective.	For a site of the scale of East of Halewood, it is beneficial to have in place design guidance that will deliver consistency and quality within the new development. This should be a helpful tool for all developers, giving practical and helpful guidance in order that they can deliver the high quality development sought by the Council's policy framework for this important site. This approach aligns with best practice in planning for large residential developments. We have been clear that this part of the masterplan document does not set fixed parameters, but rather sets out a flexible code which developers should respond to through planning applications. Therefore we do not consider that is it is too prescriptive	No	Final masterplan is clear about the intended use of section 6 (design guidance)

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
			or restrictive. The final masterplan makes the intended use of the design guidance part of the document clear.		
Cass Associates	**Key point 2**	The level of prescription is especially unhelpful where it relates to finishing materials and landscape specification. There is a need for more flexibility and a recognition that there could be alternative materials or other specifications that might be more durable, viable and resilient and, ultimately, more appropriate for individuals and organisations responsible for management and maintenance in the long term.	We do consider that there is merit to ensuring consistency of materials and landscaping across the development, particularly as it will be delivered by a number of different developers – these are the features that will tie the development together and give a sense of place. We do accept that some of the materials set out within the draft masterplan need revision – for example permeable paving and resin bound gravel driveways.	No	Changed specification of lane carriageway, permeable carriageway and drive way materials.
Cass Associates	**Key point 3**	Different categories of open space throughout the development need to add value and be justified. In this respect there needs to be an acceptance that some components of open space network will be primarily to accommodate surface water drainage or flood risk or to secure added biodiversity whilst other components will be geared towards active community use. An example is the flood compensation area. This will function to mitigate the risk of flooding and to enhance biodiversity, rather than as functional public open space. There is functional open space elsewhere that will meet the	We acknowledge that the Masterplan needs to provide further clarification as to the role and function of the flood storage area (FSA), particularly in terms of its POS function. Generally, we do not agree that this should remain completely private.	No	The final Masterplan provides further clarification as to the role and function of the NIA / FSA, particularly in terms of its POS function

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		requirements for park and garden amenity greenspace and children's' play areas as set out in Table 4.2 of the draft SPD.			
Cass Associates	**Key point 4**	The scope and detail of off site highway improvements will be informed by Transport Assessment(s). This needs to be made clear. The off site highways works in the Masterplan can only be seen as indicative. The full suite of improvements suggested by the Masterplan might not be required once full technical appraisals have been concluded.	We acknowledge that further evidence is needed to support the identification of highways improvements, as well as details of the timing and method of their delivery. This evidence is available to support the final Masterplan.	No	Further details on highways improvements are included in the final masterplan.
Cass Associates	**Key point 5**	In contrast, the guidance on some matters that will impact on the ability to deliver a successful development is not sufficiently clear. There is a need for greater clarity and certainty on, for instance, developer contributions and the triggers for infrastructure that supports the whole development.	Agreed that further detail on developer contributions is needed in the final masterplan. The matter of triggers for developer contribution payments may only be finalised at the planning application stage, within s106 legal agreements.	No	Further detail on developer contributions is included in the final masterplan.
Cass Associates	**Key point 6**	There needs to be greater detail on the mechanism to secure infrastructure that falls beyond plot boundaries, taking into account the fact that development will be phased over a long period and, as such, developer contributions will be paid in stages. Not all off site interventions can be funded in the early stages of the development. As	As above, the need for detail on the infrastructure delivery mechanisms is agreed. Our view is that completely independent delivery of parcels is not achievable, given the interdependencies between parcels in relation to different categories of infrastructure, however we have sought to ensure that the proposed	No	As above

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		development will be brought forward in stages it is important to recognise that the infrastructure to serve an individual stage should not be reliant on the delivery of infrastructure at another stage in the development.	approach to infrastructure delivery is reasonable and will not delay development of the site.		
Cass Associates	**Key point 7**	The roof tax to be levied through developer contributions is a significant cost to delivery. More information is needed before the SPD and Masterplan are finalised. These contributions will have a significant impact on viability and the ability to deliver the new housing. It should be recognised that there needs to be a reasonable and realistic balance between the extent of developer contributions, the call for developer parcel requirements such as open space and the finer details of new development such as road surfacing and boundary treatment. A successful development will incorporate all of these but in a proportionate and appropriate way.	As above, it is agreed that further detail on developer contributions is needed in the final masterplan. We do acknowledge that the Masterplan needs to be supported by robust evidence in relation to deliverability and viability. This evidence is available to support the final Masterplan.	No	Final masterplan content reflects the final deliverability and viability evidence, as necessary.
Cass Associates		**Chapter 3, Table 5.2-** The opening of the redundant railway arch is an aspiration that can only be realised in partnership with Network Rail. It is possible that the cost will outweigh the benefit. This needs to be recognised. It is appropriate that Finch Wood is the primary focus for investment to create a high quality park	We consider that opening up an additional railway arch on Lower Road needed to address existing pedestrian safety issues, to ensure continuity in the cycle/footpath network proposed, and also represents an opportunity for a key place making asset for the site.	No	Further details on highways improvements are included in the final masterplan.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		and amenity landscape area with childrens play facilities carefully integrated.	We accept that this scheme would require the support of Network Rail as landowner, and also in relation to safeguarding the existing railway infrastructure. The Council continues to pursue this matter with Network Rail. Alternative mitigation measures to accommodate safe pedestrian/cycle connections could be considered if this preferred option is not ultimately viable.		
Cass Associates		**Chapter 5, Figure 5.3 and Table 5.1:** There are components on the Framework Plan that are too prescriptive and constrain development unnecessarily. Examples include: i. Off street dedicated pedestrian and cycle routes that bisect and divide housing plots and inhibit the efficient layout of housing. ii. Elements of greenspace such as that around the Fishing Ponds and around Finch Woods. iii. Upgrade of pedestrian crossing points in advance of the outcome of Transport Assessment. **(also relates to chapter 5, figure 5.7 and 5.9)**	We agree that there is some merit in further rationalising/clarifying the provision of cycleways through the site. We also agree that there is a rationale for reconsidering the area of greenspace around the fishing pond, along with identifying a developable area within this land ownership, however we consider the buffer to Finch Woods is necessary to accommodate SUDs infrastructure and provide necessary transition from the public park to the residential area; this is shown in more detail in the final masterplan.	No	Rationalised cycle routes within the final masterplan. Final masterplan includes rationalised area of greenspace around the private fishing pond. Further details on highways improvements are included in the final masterplan
Cass Associates		**Chapter 5, 5.20** It needs to be made clear that affordable housing is subject to viability appraisals	This is already made clear in the preceding paragraph 5.19. However, we can add a further “in accordance	No	Added “in accordance with this policy” to the beginning of 5.20.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		and that other planning requirements / contributions take priority (cross reference Core Strategy Table 11.2 which is included in the draft SPD).	with this policy" to make sure this is clear.		
Cass Associates		**Chapter 5, 5.52** Swales need to be incorporated with care. Along streets this cannot be achieved where there is a need for multiple points of access.	We accept that the spatial prescription of the location of these facilities is not necessary within framework plans; however we consider that identifying potential locations, and the specification for such facilities should they be included, will be helpful. We have includes a scenario where swales could be incorporated alongside primary routes, where direct drive access is not required.	No	Final masterplan provides guidance on the inclusion of ponds and swales but does not prescribe spatial locations for their use.
Cass Associates		**Chapter 5, table 5.3:** There needs to be a relationship with the open space standards set out in Table 4.2 of the draft SPD (A calculation based on average household size and a yield of 1500 houses shows that the proposed open space in Table 5.3 is in well in excess of the requirements in Table 4.2 of the draft SPD for park and gardens, amenity greenspace and childrens' play). This means that there is some flexibility in the way that open space is distributed and delivered. For outdoor sports the focus should be on Halewood Leisure Centre as this is an	Noted. The position will be clarified within the final masterplan and SPD.	No	Clarify final position on POS (including where flexibility can be applied) in the final masterplan.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		established community facility with unrestricted access.			
Cass Associates		**Chapter 5, figure 5.11:** This is too detailed. It needs to focus on key access and movement principles but to step back from an indicative road layout. Comments already made about dedicated pedestrian and cycle routes apply. **Also applies to figure 6.6**	We consider this diagram is useful in illustrating the movement hierarchy within the site tying to the design guide elements for different routes. We can add some clarification about which routes are broadly fixed, and which there is significant flexibility in terms of location of different route typologies. Please note earlier response on the extent of cycleway within the site.	No	Final masterplan clarifies which elements of the movement framework are illustrative.
Cass Associates		**Chapter 5, 5.89:** Any interventions to improve junctions and pedestrian crossings beyond the site boundary will need to be justified and agreed through Transport Assessments. It is premature to come to conclusions on proposed interventions.	We acknowledge that further evidence is needed to support the identification of highways improvements, as well as details of the timing and method of their delivery. This evidence will be available to support the final Masterplan. The role of transport assessments at the application stage is noted.	No	Further details on highways improvements are included in the final masterplan.
Cass Associates		**Chapter 5, 5.94:** Whilst it is understood why a coherent street network is needed it must also be recognised that this will be a phased development and so individual parcels of housing will need to meet their own access needs, independent from	As noted above, our view remains that completely independent delivery of parcels is not achievable, given the interdependencies between parcels in relation to different categories of infrastructure. However the Council has sought to be as	No	The final masterplan includes the Council's expectations for an approach to joined up infrastructure delivery.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		adjoining parcels.	pragmatic as possible in recognising the need for development to come forward in connected parcels. Some small parcels remain inaccessible without third party connections being provided by adjacent landowners; this needs to be recognised.		
Cass Associates		**Chapter 6, figure 6.4:** There should be a focus on the edge of each development plot and less detail for the core of each plot where there is a need for flexibility in order to deliver effective and efficient housing layouts.	We consider this is achieved through the inclusion of figure 7.2 of the draft masterplan which illustrates key edge interdependencies. The purpose of Figure 6.4 in the draft masterplan is quite different – it is relevant to consider urban design features within parcels.	No	No
Cass Associates		**Chapter 6,table 6.1:** Direct access for housing and swales along primary routes are in conflict. Swales are not appropriate. Other requirements are prescriptive and over ambitious (such as the use of conservation block paving). There needs to be reference to the extent to which the road corridor will be adopted.	As noted above, we accept that the spatial prescription of the location of these facilities is not necessary within framework plans; however we consider that identifying potential locations, and the specification for such facilities should they be included, will be helpful. We do not agree that the level of detail represents excessive prescription; indeed, materials used within the highway represent one of the key areas within which consistency throughout the site will	No	Final masterplan provides guidance on the inclusion of ponds and swales but does not prescribe spatial locations for their use.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
			be important. The inclusion of specifications within the masterplan has been undertaken in consultation with the LHA, and there is no concern on their part that specifications will result in un-adoptable roads. Precise extent of road corridor adoptions would be subject to subsequent discussions as part of planning applications.		
Cass Associates		**Chapter 6, table 6.8 and table 6.10:** There needs to be a recognition that there are other surface material options for the carriageway and driveways to permeable block paving.	We accept that the proposed materials for the carriageway for lanes, and more generally for driveways, are not appropriate given the impermeable ground conditions within the site.	No	Changed specification of lane carriageway and drive way materials to remove reference to permeable materials
Cass Associates		**Chapter 6, figure 6.53:** Comments already made need to be reflected in the redrafting of the illustrative masterplan.	Please see above.	No	No
Cass Associates		**Chapter 6, figure 6.63:** The two key issues arising from this sketch are: i. The dedicated pedestrian / cycle route should be aligned with road corridors rather than bisecting development plots ii. The primary street around Finch Woods results in a long length of single sided development. In particular the length of primary street on the south	Point i. As above, we agree that there is some merit in further rationalising/clarifying the provision of cycleways. Point ii. Disagree as the primary street to the south of Finch Woods facilitates the requisite bus service and positive relationship to an appropriate access solution on	No	Rationalised cycleway in final masterplan.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		side of Finch Woods is not needed.	Baileys Lane opposite the Leisure Centre access. This primary route alignment has previously been supported by the housebuilders.		
Cass Associates		**Chapter 6, figure 6.6:** The sketch shows details which are in conflict with other illustrations showing the flood compensation area as a flood mitigation / biodiversity enhancement zone. Public access through this area is not practical and could be detrimental to the objective of improving biodiversity. The sketch should be deleted or significantly changed.	As noted above, we acknowledge that the Masterplan needs to provide further clarification as to the role and function of the flood storage area (FSA), particularly in terms of its POS function. Generally, we do not agree that this should remain completely private.	No	The final Masterplan provides further clarification as to the role and function of the NIA / FSA, particularly in terms of its POS function
Cass Associates		**Chapter 7, table 7.1:** Reference needs to be made to the viability of bringing forward housing and the ranking of planning requirements. Some of the infrastructure is essential; other aspects of infrastructure can only be provided if it is viable to do so. Care must be taken to ensure that contributions are fully aligned with the tests for planning obligations. There is some doubt, for instance, that the Social Value Strategy is directly related to new development and necessary to make any new development acceptable in planning terms.	The "ranking" of developer contributions sought is set out within the Local Plan policy CS27 and the Developer Contributions SPD. The same order is applied to the table here. Clarity with respect to the Social Value Strategy requirement is set out within the Employment and Skills SPD. This, along with electric vehicle charging points, comes lower on the list of requirements given the lack of status afforded to these elements in Local Plan policy.	No	No
Cass Associates		**Chapter 7, 7.8:** It is understood why a co-ordinated	Please see our earlier response to a similar point - our view remains that	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		approach to infrastructure delivery is an objective but it also needs to be recognised that individual phases of development need to function independently and not be reliant on (future) infrastructure provision on land beyond the phase boundary.	completely independent delivery of parcels is not achievable, given the interdependencies between parcels in relation to different categories of infrastructure.		
Cass Associates		**Chapter 7, 7.22:** The 'roof tax' approach should be subject to viability assessment for individual plots. For certain plots the costs of infrastructure will be high (for instance, the creation of the flood compensation area and biodiversity gains in the northern plots). This would temper the degree to which contributions linked to parts of the development can be levied. More detail is needed on the scope and potential costs of the 'roof tax' elements.	As noted above, we do acknowledge that the Masterplan needs to be supported by robust evidence in relation to deliverability and viability. We consider that a pragmatic approach is to consider whole-site viability, rather than the Council assessing individual plot viability, which would be more appropriately undertaken at the application stage (if necessary). We consider affordable housing could provide relief in instances where viability is challenging.	No	The final masterplan reflects viability and deliverability evidence.
Cass Associates		**Chapter 7, 7.3:** As mentioned, there is some doubt that the contribution to a Social Value Strategy is necessary to make the development acceptable in planning terms.	Please see above response.	No	No
Cass Associates		**Chapter 7, 7.23:** The Options Report appraisal of viability does not include any allowance for S106 contributions (including the delivery of	Noted. We do not consider that an amendment to the Masterplan is required to reflect this acknowledged part of the Council's existing policy	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		affordable housing) or abnormal development costs. These can have a significant impact on viability and the ability to deliver housing. It needs to be recognised that plot by plot viability appraisals will determine appropriate and justified contributions, taking into account the abnormal costs to be addressed on any one plot. With this in mind there needs to be an inter-play with the 'prioritisation of infrastructure' set out in the draft SPD. If this process shows a justification for the inclusion of affordable housing then there is a need to maintain flexibility on type and tenure to ensure that the balance of affordable housing and market housing is appropriate and to account for the practicality of housing delivery overall.	framework.		
Cass Associates		**Additional comments:** These comments relate to the Options Testing and Preferred Options Report, particularly the Financial Appraisal. They should be considered alongside comments already submitted on the SPD and the Masterplan by Cass Associates on behalf of Mr M Leary. 2. Clause 7.7 of the Masterplan and Preferred Options Report is titled Summary of Option Financial Appraisal and we wish to make the following	The inclusion of this content in the Options and Preferred Option report was heavily caveated to explain the purpose of the exercise undertaken by Keppie Massie. It is not the Council's intention to use this information within the final masterplan – as noted above, we have committed to ensuring that the final Masterplan will be supported by robust evidence in relation to deliverability and viability. The housebuilders / landowners input has been included within this process.	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		observations. a) In our opinion it is unacceptable for this type of information to be placed in the public domain without any consultation with the landowners and developers. b) The landowners and developers have had no opportunity to make any inputs into the appraisal and as a result the outcomes are worthless. c) It is stated that the assessment is a "very high level" appraisal which has been based on "broad land use proposals". There is no reference to the actual proposals being put forward by the developers nor is there any understanding of the information which has been gathered by the landowners and the developers. No input has been sought from the developers or the landowners. It is therefore clear that the output must be considered to be flawed and to be without any real foundation. We fundamentally disagree with the conclusions. As such it cannot be used as the basis for any future discussion. d) The value of the Financial Appraisal is also diminished because it does not align with the requirements and design guidance set out in the draft SPD and masterplan.			

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		e) We consider the publication of information generated in this manner is most unhelpful and is misleading to interested parties.			
Savills	**1.3 and 1.4**	The starting point for the representation is that The Estate does not support either the Masterplan or the SPD as they are currently drafted in relation to its landownership. However, subject to minor amendments, The Estate will be able to provide formal confirmation that it can support both the Masterplan and the SPD. In the main, the required amendments have already been requested in an e-mail to Barry Fawcett, Head of Strategic Housing and Investment at Knowsley Council, dated 20 February 2019. A copy of that e-mail is included at **Appendix 2** The amendments required are not substantial changes to the Masterplan or SPD, but are required to reflect the sustainable development that could be realised on The Estate's site. Neither document currently reflect the development that could be realised as part of the Sustainable Urban Extension.	Please see responses to detailed points below.	No	No
Savills	**2.8 – 2.15**	**Masterplan comments** The designation of the developable area of the site, including the area of land that is currently utilised for the lay-by is a	The draft Masterplan acknowledges (in Table 3.1) that assumptions have been made about the proportion of the Hesketh Estate site that is	No	Noise buffer designation changed within final masterplan.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		fraction of the potential development site, owned by The Estate, which is over two times larger than the site identified for development. Whilst we note that some noise mitigation may be required for development of houses adjacent to the railway line, that mitigation may not be required for the commercial element of the mix of uses that could be accommodated at the site, and neither is the level of mitigation for the residential uses known. In fact the distance of mitigation suggested in the Masterplan for noise purposes, far exceeds the level of mitigation for the existing houses off Aldersgate Drive to the east of The Estate's site and there is no evidential basis to support the level of mitigation suggested in the Masterplan. It follows that the Masterplan as currently drafted potentially suggests a lower development parcel of land than could be achieved at the site. We consider this will act as a bar to the ability for The Estate to dispose of the site and ultimately the delivery of sustainable development that is required as part of the Sustainable Urban Extension. As noted above, Paragraph 5.33 on	developable, due to noise and vibration constraints – it is acknowledged that this is a baseline position until further, more detailed assessments are carried out. In the absence of more detailed studies prior to the finalisation of the masterplan, and in the absence of an understanding of the final mix of uses for this site, we can provide a different noise buffer designation. This shows a potentially larger developable area, with supporting text which clearly states that the final extent of the buffer will be defined at the planning application stage, once the mix of uses and form of development on the site is known. Point 5 – we agree that the potential mix of uses should be widened to include a small hotel use, as part of a wider complementary mix of uses, in accordance with the draft SPD for East of Halewood. Point 7: We acknowledge that further evidence is needed to support the identification of highways improvements, as well as details of the timing and method of their delivery. The final masterplan will show two accesses to the Hesketh		Changes to access points included within final masterplan. Size and capacity of the site updated. Mix of uses also updated to include a hotel. Further details on highways improvements are included in the final masterplan.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		Page 47 of the Masterplan states that the noise mitigation should be outlined in a future application. The application is therefore the appropriate mechanism to determine the level of mitigation, and ultimately the quantum of development that can be delivered at the site. Any application submission will be based on evidence that the Local Planning Authority will require in order to determine any application. Accordingly, and to ensure that the maximum sustainable opportunity for the site can be achieved, the following amendments are required in order to for The Estate to support the Masterplan: **1.** Table 5.1 – the total site area should be updated to 2.9 hectares as set out at Paragraph 2.9 above. **2.** Table 5.1 – the suggested capacity of 62 dwellings should be removed from the text in the table given the figure is likely to be much greater once the true level of mitigation required is known as part of the application. We therefore recommend the text is updated as follows: *'Total site area approximately 2.9ha (including existing lay-by)* *If brought forward only for residential*	land – one for residential use only from Aldersgate Drive, and the existing access from Higher Road for commercial uses. Point 9: the inclusion of this symbol here is a mistake and will be rectified in the final Masterplan.		

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		development, capacity would be based on up to 50dph.' **3.** Figure 5.3 – The purple and grey 'Potential mixed use development' allocation should cover the whole of The Hesketh site to the south of Higher Road. We appreciate there may be a potential requirement for the 'Proposed SUDs & attenuation pond' and note that this in effect would be the relocation of the existing pond on site. We therefore don't propose that the new pond is removed. However, in order to ensure that the remainder of the site that is not presently shown for development is not sterilised, when it is likely to be the case that there are opportunities for greater sustainable development on the site, the allocation should cover the whole site. As stated at Paragraph 5.33 on Page 47 of the Masterplan noise mitigation should be outlined in a future application. It follows that the application is the appropriate procedure to determine the level of mitigation required and not the Masterplan, which is what the aforementioned paragraph in the Masterplan confirms. **4.** Figures 5.1, 5.5, 5.1, 6.1, 6.2, 6.31, 6.37, 6.42, 6.45, 6.53, 6.54 – As a consequence of the required amendment to Figure 5.3, Figures 5.1,			

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		5.5, 5.13, 6.1, 6.2, 6.31, 6.37, 6.42, 6.45, 6.53 and 6.54 should also be updated to reflect the potential development area. The key to Figure 5.1 should also be updated to state 'Potential mixed use development' as opposed to 'Residential-led mixed use development parcel.' **5.** Paragraph 5.34 which sets out that non-residential uses would likely be limited to small scale retail and/or commercial leisure (e.g. family public house / restaurant). Paragraph 4.16 of the SPD commented on in more detail below sets out that a hotel may also be a potential development opportunity for the site and therefore the Masterplan should be updated to reflect the SPD for consistency purposes. **6.** Figures 5.7 and 5.9 – The noise attenuation areas on The Estate's site should be removed as this will be a matter for the planning application. 7. Figure 5.11 – The Figure sets out the access and movement framework plan. Point (8) on the plan indicates there may be a secondary access into The Estate's site from Higher Road. It is not known whether a secondary access will be required. Therefore, this access should be demarked 'potential secondary			

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		access, subject to detailed assessment'. Figure 6.6 and 7.2 should therefore also remove this access street, or note it as a potential access, until the requirements are known as part of a planning application. **8.** Figure 6.4 – The Figure sets the Urban Design Framework Plan. It outlines an area of 'Frontage to public open space' on the plan. As the area of mitigation is not known, it is not appropriate to set this requirement as the area that may be developed could be much greater. **9.** Figure 6.36 – There is an error on the Figure as it includes potential for play areas in the potential mitigation area on The Estate's site. The designation is not a formal one like the other markings on the Figure. As it is not known whether there will be a requirement for mitigation, and nor is it known how much that mitigation may be, it would not be appropriate to designate this area in any event. Additionally, Figure 6.36 is required to be updated for the reasons set out at (4) above. Whilst The Estate supports the overall designation of the site for potential mixed-use development, it does not support the area shown for development			

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		on its site. The area shown for development in the Masterplan is likely to be much smaller than the area of development that will be delivered in practice. As the Masterplan notes, the planning application will determine how much development can be delivered on the site. The Masterplan as drafted therefore sterilises the potential development of the site and gives the indication that there will be certain requirements for the area of land directly adjacent to the railway land when this is no evidential basis as they are based on a hypothetical assumption on the potential level of noise mitigation, which is likely to be substantially less than that shown in the Masterplan. It follows that there is straightforward way to rectify the Masterplan as outlined in particular at Paragraph 2.11 (3) above. Given such a minor amendment is required, with no negative implications for the Masterplan, we trust that this will be undertaken and we would be grateful if you could confirm that this will be the case by return correspondence.			
Savills	**2.16 to 2.21**	**Supplementary Planning Document** The comments on the SPD focus only	We acknowledge that the final SPD and Masterplan will need to offer consistency in their content relating	Change wording as set out in representations	Ensured treatment of the site in the final Masterplan is consistent

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		on its Paragraphs 4.16 – 4.18, which are specific to the development of The Estate's site and relate to the delivery of 'non-residential uses'. Paragraph 4.16 sets out that The Estate's site *'…is heavily constrained and it is likely that technical studies will identify significant noise impacts from the main road and the railway…'*. The Paragraph states further that the site may therefore be a suitable location for Use Classes C1, A3 and A4 rather than housing. The commentary here is in conflict with the potential development requirements in the Masterplan that does not provide a bias to the type of development that could be delivered at the site. In fact, as set out above, the key to Figure 5.1 of the Masterplan, designates The Estate's site as being a 'Residential-led mixed use development parcel.' Accordingly, Paragraph 4.16 of the SPD should be updated to reflect that there is an equal chance of residential and commercial development on the site as follows (Savills' amendments in deletions and underlines): *'Non-residential development will not be*	to the Hesketh Estate land. As noted previously we are happy to clarify that the mix of uses could include a small hotel, with the wording as follows: *"… The site may also be a suitable location for uses such as a small scale hotel, small-scale retail uses, restaurant and/or family pub type (use classes C1/A4/A3) rather than, or in addition to, housing."* We agree that the following wording should be added to 4.17/4.18, to clarify when retail uses would be acceptable. *"The site's proximity to Halewood Shopping Centre means that there is a significant opportunity for new residents at East of Halewood to use the existing facilities, boosting vitality in this centre. If non-residential uses are pursued in the masterplan or through applications, it will need to be demonstrated how such proposals meets the 'sequential test' and other requirements (of Core Strategy Policies CS4 and CS6, as well as SUE2b) regarding impact on town centres and complementing regeneration opportunities."*		with the SPD, including specifying that a suitable mix of uses could include a hotel use.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		acceptable in the part of the site north of Higher Road. The southernmost part of the site, between Higher Road and the West Coast Mainline railway, is heavily constrained and it is likely that technical studies will identify significant noise impacts from the main road and the railway may present an opportunity for non-residential uses subject to market requirements. Given this, this The site may also be a suitable location for uses such as a hotel, small-scale retail uses, restaurant and/or family pub type (use classes C1/A4/A3) rather than housing.' We note the Council's requirement for any 'main town centre uses' to be assessed against the sequential test and impact assessment. The application of these policy criteria may not rule out retail uses. We therefore consider it would be premature to suggest that retail facilities on site would be unlikely to be acceptable as Paragraph 4.17 suggests. Accordingly, we request Paragraphs 4.17 and 4.18 are combined as follows: *'The site's proximity to Halewood Shopping Centre means that there is a significant opportunity for new residents at East of Halewood to use the existing facilities, boosting vitality in this centre. If non-residential uses are pursued in the*			

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		masterplan, it will need to be demonstrated how such proposals meets the 'sequential test' and other requirements (of Core Strategy Policies CS4 and CS6, as well as SUE2b) regarding impact on town centres and complementing regeneration opportunities.'			
Indigo Planning		**Draft SPD policy EH2: East of Halewood masterplan** Point 5 of the draft policy requires the masterplan (and subsequent applications) to demonstrate how phasing and sequencing of development will be facilitated across the entire site. Having reviewed the draft masterplan report, there is no indication as to how the phasing and sequencing of development across the site will be facilitated. At this stage the draft masterplan just notes that there will need to be a coordinated approach to phasing/sequencing and delivery of development but with no explanation as to any, even high level, phasing proposals. Therefore, at this stage, the draft masterplan does not meet the requirements of draft SPD policy EH2. This raises concerns that there is an absence of collaboration between	We agree with the general point being made here – which is that this is an extremely important site for the Council, and for which we need to be confident can be delivered comprehensively. Preparing a masterplan for the site is a key way by which we can secure this. While we do not anticipate that a prescribed phasing of parcels coming forward for development will be necessary within this site, we do consider that the delivery of physical infrastructure will need coordination in terms of timing of delivery – hence "phasing" is an appropriate word to describe this. The masterplan responds to this requirement in section 7 – this section will be further developed in the final masterplan to account for deliverability and viability evidence. The masterplan outlines the	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		landowners as there is no evidence of any initial phasing or sequencing plans or arrangements within the draft masterplan. Indeed, one of the threats identified in the SWOT analysis within the draft masterplan report (page 26) is, *"pha*sing of development across ownership boundaries not coordinated to achieve optimum integration with *surrounding area and between parcels".* The success of this entire masterplan area is dependent upon all landowners /developers working together and all buying into a high-level phasing plan which will set the programme for parcels of land within the wider site coming forward and delivery of the necessary supporting infrastructure. Without this agreement, the delivery of the site, particularly in the short term is at risk. The Council is heavily reliant on this site, and the other SUEs, coming forward within the plan period (up to 2028) to meet its housing needs. In fact, the draft SPD notes *"the Ea*st of Halewood site, along with the other SUE sites in Knowsley *are vital to the Council's ambitions for economic growth, quality of place and quality of life"* (paragraph 3.10). The adopted Core Strategy (policy CS3) seeks to direct 16% of the overall	expected collaboration between developers, to achieve comprehensive development. In particular, the delivery section outlines parcel interdependencies where developers will be required to work together to deliver seamless infrastructure connections, which enable the delivery of the site as a whole. The land at Church Road (the land owned by the party submitting these representations) is in the Green Belt. In policy terms, new residential development in this location would not be acceptable. We cannot comment on the technical constraints associated with the site, nor the infrastructure that would be required to bring this site forward. In contrast, the East of Halewood site is an allocated site within the Council's Local Plan, adopted in 2016. Its deliverability is supported by this masterplan, and supported by the majority of landowners, including those working in partnership with housebuilders, who expect to bring forward applications for development in the near future. The Council is satisfied that the East		

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		housing requirement, which equates to 1,296 dwellings, towards Halewood. The allocation of the East Halewood SUE, for approximately 1,100 dwellings, would largely meet this requirement, therefore, the Council is heavily reliant on this SUE coming forward. However, if the delivery of the SUE was to slip or become delayed then Halewood would not be receiving sufficient new housing to meet its identified requirement in the Core Strategy as the established local need. This indicates that additional sites, particularly those that are able to start delivering housing in the short term are required. As set out at paragraph 59 of the NPPF, *"to support the Government's objective of* significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come for*ward where it is needed".* Land north of Church Lane, Halewood (site location plan enclosed) represents an opportunity for the housing needs of Halewood to start being met in the short term whilst the challenging task of coordinating all landowner / developer interests on the East Halewood SUE is being worked out. This site can come forward alongside the SUE. In summary, assurance of housing	of Halewood site will deliver sufficient housing in Halewood, to help meet the annual targets for Knowsley identified in the Local Plan. It should also be noted that Knowsley currently has a robust borough-wide five year supply of housing land.		

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		delivery is key, and, therefore, the SUE must address this, and other sites must be considered. Land north of Church Lane is a deliverable site located immediately adjacent to the settlement boundary of Halewood. It is in single ownership and able to come forward in the short term without the need for significant new supporting infrastructure or public funding. There are no technical constraints that would prevent land north of Church Lane coming forward for development.			
Indigo Planning		**Draft policy EH3: Development Parameters** There are a number of technical constraints associated with the site, including flood risk in the northern part and noise/vibration in the southern part. Therefore, raising question marks over the proposed level of housing the SPD and draft masterplan anticipate can come forward on this site. Taking flood risk first, the northern part of the site is shown to fall within Flood Zone 3 on the Environment Agency's flood risk. Therefore, more vulnerable uses such as housing should not be located within this area unless the sequential and exceptions tests have been passed (as required by the NPPF).	In response to the comments on flood risk, we acknowledge that the northern part of the site, adjacent to Ditton Brook, is currently within Flood Zone 3. The proposed Flood Storage Are (FSA) is designed to mitigate this risk; both the Council and the EA have been consulted on these proposals, and we are happy that they represent an appropriate approach to ensuring that the developable area is relates appropriately to flood zones 2 and 3. With respect to noise and vibration, we acknowledge the constraint associated with the Hesketh land; the final masterplan reflects that noise mitigation will be required, and will provide a constraint for the	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		There is no mention in the draft masterplan report or accompanying documents that a sequential approach has been adopted when determining where across the site residential development should be located. The Framework Plan in the draft masterplan report shows an element of proposed residential development falling within the Flood Zone. However, there is no evidence to support that the necessary tests have been carried out and indeed passed to allow housing to be located in this part of the site. Therefore, further justification needs to be provided on the suitability of the northern part of the site to accommodate new housing development. In addition, due to the presence of the West Coast Mainline and adjacent industrial and leisure facilities, the southern part of the site is particularly sensitive to noise/vibration. Whilst technical surveys have been carried across the site, there is an absence of survey data relating to noise/vibration along the Hesketh Lane area. The approach adopted is to assume that noise constraints mirror those for land to the north of the A562. However, there are differences between the two areas and for the noise/vibration assessment	developable area for this plot. The mitigation required will differ whether the site comes forward for residential, mixed use or commercial uses. We are committed to working with the landowner of this site to establish further technical evidence for this parcel, to support detailed development proposals at the planning application stage. The number of homes to be delivered within East of Halewood is stated as at least 1,100 and up to 1,500 in the draft SPD. The masterplan refines this further, giving a range of between 1,250 and 1,500 new homes, based on our understanding of the developable area, and an appropriate density range. We are confident that the site will deliver more homes than anticipated in the Local Plan, and hence make the required contribution to overall housing delivery in Knowsley. Please see below response for further details on this matter. We do not consider that there is any justification for lowering our indicative capacity stated, and certainly no justification stated here for considering alternative sites in the Green Belt.		

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		to be robust detailed studies of both areas should have taken place. Even without this assessment, paragraph 4.16 of the draft SPD notes that the southern part of the site might not be suitable for housing. The lack of evidence relating to just these two technical matters raises questions over the actual number of dwellings that can be delivered from the masterplan area, meaning it is likely to be lower than initially anticipated. Therefore, the heavy reliance by the Council on this SUE to largely meet the housing needs of Halewood is a risky approach. The Council, should, therefore, seek to reduce numbers on this site and look at and encourage other deliverable sites, such as land at Church Lane Halewood, to come forward to ensure that the local housing needs of the area are met in full; as required by the NPPF.			
Indigo Planning		**Draft policy EH4: Residential Development** We object to the first part of draft policy EH4 and the reference to the maximum number of dwellings expected to be delivered being extended up to 1,500 dwellings as it goes beyond the number of dwellings this site was allocated for in	The stated capacity of the East of Halewood site in the Local Plan Core Strategy was “approximately 1,100 homes” – however this was based on a basic understanding of the developable area, excluding all flood risk land, and also assuming that the RSPCA site was not available (it has since become vacant). This method	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		the Core Strategy. The purpose of SPDs is to be in compliance with the adopted Local Plan and provide further guidance to support a particular site, development or topic area, not increase development parameters that have already been adopted. The allocation of the SUE for 1,100 dwellings was robustly tested as part of the Examination of the Core Strategy and its allocation was found sound on the basis that it would deliver approximately 1,100 dwellings. It is appreciated that the wording of the Core Strategy only identified an "approximate" number of dwellings to be delivered, however, we consider that an increase of 400 dwellings (to get to 1,500) goes beyond this as it represents a 35% increase. This is in affect seeking development "through the backdoor" and does represent a sound approach. Draft policy EH4 should be amended with reference to delivering 1,500 dwellings removed. Furthermore, we question whether delivering up to 1,100 dwellings is overly ambitious given the site constraints (already discussed in response to draft policy EH3) and the desire to see the	also applied a nominal density of 30dph, which is at the lowest range of what the masterplan considers to be appropriate. The SPD and masterplan preparation process has allowed for a better understanding of developable area and appropriate densities. We do not consider that there is any policy issue associated with the approach to identifying residential capacity within the SPD and masterplan; indeed, the approach represents an efficient approach to the use of available land.		

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		site deliver more executive style housing at lower densities.			
Indigo Planning		**Draft policy EH5: Public Open Space** Paragraph 4.27 of draft SPD states that "open space for play and recreation should be strategically distributed throughout the site, delivering a structured and legible network of spaces which contribute to the character of the development". From a review of the draft Framework Plan within the draft masterplan report whilst it is clear that there are large areas of amenity greenspace in close proximity to the SUE there is limited provision within the actual SUE itself. On this basis, the draft Framework Plan does not meet the requirements of the draft SPD. For a development of the size proposed there is insufficient amenity greenspace currently provided on the draft Framework Plan, with some areas of proposed housing being quite removed from the areas of proposed amenity greenspace. There needs to be an increased provision of amenity greenspace provided across the site as per the requirements of the draft SPD.	We do not agree that there is insufficient amenity greenspace provision within the masterplan. Table 5.3 states that with the FSA, there is over 18ha of amenity greenspace planned – albeit it is accepted that the extent of some of this space will be subject to further refinement. This is in addition to the area identified at Finch Woods, located centrally to the site, which will accommodate park and garden and play typologies.	No	No
Indigo Planning		**Draft SPD policy EH9: Streets, paths and movement**	We acknowledge that further evidence is needed to support the	No	Final masterplan identifies highway

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		The final point of the draft policy notes that developer contributions will be required to contribute to the necessary off-site works and public infrastructure identified in the masterplan to enable accessibility to the site and to mitigate highways impacts from the development. As set out at paragraph 7.15 of the draft masterplan report, the developers of East Halewood will need to work together to identify the detailed off-site highways works required and propose a delivery plan including prioritisation, trigger points and phasing / sequencing. The draft masterplan report notes that further details on the scope and timing of these improvements will be included in the final masterplan. However, this assumes that there is agreement between all 19 landowners on the scope and costings of the proposed works. There is no evidence included in the draft masterplan report or accompanying draft SPD that this level of coordinated working is currently taking place and raises questions about the ability of an agreement and phasing programme to be agreed in the short term. Delays to agreeing this off-site highways package will ultimately result in delays in the site	identification of highways improvements. This evidence is available to support the final Masterplan. There is no current evidence that this matter will jeopardise the delivery of the site in accordance with the masterplan.		improvements required.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		starting to deliver housing. If a coordinated way of working can't be agreed then this could ultimately jeopardise the delivery of the SUE, particularly in the short term / plan period.			
Indigo Planning		**Draft policy EH12: Planning Application Requirements** There is support for the Council's preference that all applications coming forward at the site should be full applications and be subject to EIA. This will ensure that the proposals coming forward are robust and include sufficient detail to comply the site wide masterplan. The draft SPD requires the masterplan to *"demonstrate how issues relating to* infrastructure provision, including necessary financial contributions, can be resolved comprehensively, rather than in a piecemeal way through individual *planning applications"* (paragraph 6.4). This is carried forward into draft policy EH12: Planning Application Requirements, requiring planning applications to demonstrate how phasing and sequencing of development will be facilitated across the entire SUE. This request is supported, as it is	With respect to the objection to the provision that applications can come forward separately, subject to meeting the provisions within the masterplan, we do not believe that this is reasonable. It is up to applicants to demonstrate how they are delivering against the masterplan, which in turn is designed to ensure that the Council is provided with assurances that the site will be delivered comprehensively (including infrastructure) and with a consistent approach to design and quality. The final version of the masterplan will be bolstered with further detail on deliverability, supported by viability evidence – further detail on this is provided below.	No	No – please see below response.

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		important, given the statement in the draft masterplan that the delivery of strategic and local infrastructure is required to unlock the development of the site, that this can viably and comprehensively be delivered. Therefore, without the necessary infrastructure being in place development at the site would be unacceptable as it would not able to suitably mitigate its impacts. As discussed further in the latter part of these representations, the mechanisms by which this collaboration and cooperation will take place are yet to be set out. The draft masterplan does not provide any reassurances at this stage that all landowners/developers have agreed a way forward in terms of the overall delivery of the site. The draft SPD also notes the importance of the masterplan in ensuring that development in one part of the site does not contribute to / exacerbate infrastructure issues in one part of the site, or elsewhere in the Borough. Again, at this stage, there is limited information in the draft masterplan report to demonstrate that there won't be any conflicts between bringing forward certain parcels of land at a specific time as any phasing /			

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		sequencing exercises don't appear to have been carried out. On this basis, we object to the provisions in paragraph 6.5 of the draft SPD which enables applications to come forward separately subject to demonstrating a holistic approach to the meeting the provisions of the site wide masterplan. As set out above, at this stage there are no mechanisms in place to show how this holistic approach will work. Therefore, until such matters have been resolved and there is a clear understanding, which can be evidenced, of the needs and mechanisms for infrastructure delivery no applications should be able to come forward. If this is not the case, then early applications could come forward without making sufficient contributions as the full costs and requirements are not fully known. Meaning that later phases of development have to pick up any shortfall, placing additional and onerous burdens on these later phases, which might result in development being unviable taking account of these extra costs. Furthermore, individual sites will only be able to control and deliver the infrastructure within their red line area,			

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		therefore, without a comprehensive approach being established first there is a risk that sites start to come forward without providing sufficient infrastructure etc that will be required for the delivery of the wider site.			
Indigo Planning		**Developer contributions** The draft SPD is clear that it expects all landowners / developers across the site to contribute towards the implementation of the infrastructure elements that are *"fundamental to facilitat*ing early and high-quality development of the East of *Halewood site"* (paragraph 6.1). This reiterates the importance of there being collaboration amongst all of the 19 different landowners in order to ensure that vital infrastructure is delivered. If agreement can't be reached on the delivery of this vital and fundamental infrastructure, then it risks the overall deliverability and developability of the entire masterplan area. Secondly, it highlights that there are infrastructure requirements which are fundamental to the successful delivery of the SUE. This is reiterated in the draft masterplan report which states the East Halewood SUE requires *"the delivery of* strategic and local infrastructure to	Much of the commentary here is supported by the Council; we are committed to securing comprehensive development and supporting infrastructure delivery for the whole site. We acknowledge that the Masterplan needs to be supported by robust evidence in relation to deliverability and viability. We have been transparent about the limitations of the early viability assessments undertaken, and the need to complete further work in this regard, and the draft masterplan outlined this. Further viability evidence informs the final masterplan. At this stage, we do not believe that a formal or legal mechanism for collaboration between landowners will be necessary to facilitate comprehensive development of the site.	No	The final masterplan will reflect viability evidence prepared by the Council

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		unlock the development site, and to mitigate the impact of new development for the benefit of new residents and the existing *community"* (paragraph 7.1). The fact that the infrastructure requirements are fundamental and required to unlock development of the site clearly indicates that without the necessary infrastructure the delivery of the SUE is unlikely to happen or development inputs can be unacceptable. Therefore, as already highlighted how the vital elements of infrastructure will be delivered needs to be clearly set out in the masterplan and to date from the information available, there is no evidence of how this will be done. Draft policy EH13 of the draft SPD requires the final masterplan to be accompanied by a viability appraisal to demonstrate *"that the entire proposed development is capable of being realised over time"* (draft policy EH13). This request is supported, as it is important that sites being so heavily relied upon by the Council can demonstrate there are no viability issues preventing them coming forward and delivering housing, whilst also being able to deliver the necessary infrastructure and affordable housing.			

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		Indeed, the NPPF requires developable sites to demonstrate there is a reasonable prospect that they *"could be viably developed at the point envisaged"* (NPPF, Annex 2). Demonstrating viability is crucial to the delivery of the East Halewood masterplan site. Therefore, if it is apparent that the SUE is not going to come forward at the rate anticipated the LPA need to be aware of this so that alternative sites can be identified, such as land at Church Lane Halewood, to meet the housing needs in the short term. However, at this stage only high-level viability appraisals have been undertaken to feed into the draft masterplan report. The Options Testing and Preferred Options Report provides further details on the viability work undertaken to date underpinning the draft masterplan noting at paragraph 7.19: *"at the present time, the a*ppraisals do not include any allowance for abnormal development costs which may become apparent as investigations progress nor do *they include any section 106 contributions that ultimately will be required"*. Therefore, whilst the draft masterplan			

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		report states that the high-level viability assessments carried out show that overall the site is considered viable, there are concerns with the robustness of these initial assessments and the evidence underpinning these claims that development of housing is viable across the entire site. The high-level assessments only considered the masterplan area as a single site. No assessments have been made of individual parcels to determine whether or not these are in fact viable and able to come forward for housing. There is no evidence to demonstrate that each parcel of the masterplan area is viable. Given the uncertainties as to the viability of each individual parcel and the fact that the Council is not intending to establish an equalisation framework for individual landowners or developers, it is not clear from the information available that there is actually agreement between all parties to move forward. As we know from both the draft SPD and draft masterplan, it is vital that all parcels are delivered comprehensively. If it became apparent as further viability work is carried out that specific parcels were unviable or less viable than neighbouring parcels this could hinder			

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		the collaborative approach required to deliver the masterplan. Furthermore, the viability work carried out to date has not allowed for any site abnormals or S106 contributions when determining whether delivering housing across the site is viable or not. It is clear from both the draft SPD and draft masterplan report that significant physical and social infrastructure (education, healthcare) is required in order for the site to come forward for development and that to date the costs of delivering this are unknown. As we know from both the draft SPD and draft masterplan, it is vital all parcels are delivered comprehensively. If it became apparent as further viability work is carried out that specific parcels were unviable or less viable than neighbouring parcels this could hinder the collaborative approach required to deliver the masterplan. Therefore, a crucial and early part of work that needs progressing now in advance of any further work on the draft SPD and draft masterplan is to prepare a detailed infrastructure delivery plan. This should set out the full extent of all physical and social infrastructure requirements across the full site and			

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		then set out mechanisms as to how this will be delivered, contributions provided etc. This needs to be a formal SPD in itself that binds all landowners/developers to their individual contributions. Without this there is always the risk that the delivery of infrastructure could fall apart, which would then mean the site is unable to come forward. Therefore, it is recommended that work is put on hold on the draft SPD and draft masterplan until viability and sequencing / phasing of infrastructure delivery have been fully explored and a formal mechanism that all landowners/developers have signed up to is in place. This will also avoid parcels of the site coming forward in due course that are unable to fully meet their obligations which is a concern raised in paragraph 6.16 of the draft SPD.			
Indigo Planning		**Summary** The draft masterplan report does not demonstrate that there are no viability issues with delivering the required level of housing at the site alongside the fundamental and vital associated infrastructure required to “unlock”	Please see commentary above.	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		development at the site. The success of the SUE relies upon a collaborative approach from all 19 different landowners in terms of delivery programmes and infrastructure provision/contributions. Again, there is no evidence presented in the draft documents that such an approach has been agreed. For the draft masterplan to accord with the provisions of the draft SPD further work needs to be provided on both viability and the overall approach to delivery as without this the ability of the site to meet local housing needs in the short/medium term has to be questioned. We trust these representations will be taken into account as the SPD and Masterplan progress and request that we are placed on the mailing list to receive updates on the progress of both documents.			
Byrom Clark Roberts		My client objects to the proposals for the extension to the east of Halewood as it reduces open space between Halewood and the west Of Widnes and Hough Green. The logical extension of the existing settlement to the west of the existing development of Widnes must be	This response relates to the allocation of the East of Halewood site, a matter which was determined within the Knowsley Local Plan Core Strategy in 2016. This comment is therefore not relevant to the consultation on the draft Masterplan	No	No

Landowner/ developer	Ref	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		considered. The land marked in red on the attached plan is a logical extension of an existing residential area shielded by railway and should be prioritised for residential accommodation development in preference to the eastern boundary Of the Halewood community on the basis of sustainability and impact on Green Belt whilst providing effective contribution towards housing needs. (plan supplied)	and SPD. Notwithstanding this, the site in the ownership of the landowner submitting representations is in the Green Belt. In policy terms, new residential development in this location would not be acceptable. We cannot comment on the technical constraints associated with the site, nor the infrastructure that would be required to bring this site forward.		

Table 5.5 – Other respondents – detailed comments and Council response

Other respondent	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
Knowsley Older People's Voice	Concern about access to services, in particular, GP services and whether there would be additional services as a result of this development	Noted. The Council recognises that a development of this scale will have impacts on services including healthcare. This is already reflected in the SPD and masterplan, where the Council's expectations regarding developer contributions to deliver improvements to local infrastructure are outlined.	No	No
Knowsley Older People's Voice	Enquiries about school places as most of the people were aware that there was challenges around existing primary schools.	Noted. Again, this is recognised within the SPD and masterplan, which state that developer contributions will be sought to deliver additional primary school and early years places in Halewood.	No	No
Knowsley Older People's Voice	Public Transport – interest in any additional bus services, explained that there was a bus route through the development – and discussion about services would be separate	The Masterplan explains the intended high level approach to public transport access and services, including provision for a bus route through the site, and bus stops located near to Finch Woods. A subsidy is also likely to be sought from developers to support bus services through the development. The full detail of bus routes, frequency and destination is yet to be finalised.	No	No
Knowsley Older People's Voice	Halewood Train Station – complaints raised about access and car parking and whether there would be any investment in the station on the back of the development and the potential uplift in passenger numbers in the long term.	Halewood Rail Station is currently heavily constrained by its topography, which limit/prevent opportunities for car parking provisions. The intention is therefore to encourage sustainable transport connections to the facility from the development site i.e. walking, cycling and bus connections.	No	No

Other respondent	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
		Access for All type improvements at the station would be a consideration for the national DfT programme.		
Merseyside Environmental Advisory Service	**Supplementary Planning Document** P5, 1.12 This should refer to the EIA Regulations 2017	Noted – this will be actioned in the final SPD.	Updated references to EIA regulations included in the final SPD.	No
Merseyside Environmental Advisory Service	P15, Knowsley Local Plan Reference to the Merseyside & Halton Joint Waste Local Plan is welcomed.	Noted.	No	No
Merseyside Environmental Advisory Service	EH2 Note that the masterplan will be accompanied by technical reports relating to ground conditions. This is welcomed.	Noted. Planning applications will also be expected to be accompanied by detailed technical reports on ground conditions.	No	No
Merseyside Environmental Advisory Service	P15, EH2 It may be useful to include reference to waste management under part 3 of this policy. Whilst a separate survey would not be expected, the development of the site will entail a significant amount of waste generation.	This is noted but this is not considered necessary here, as a technical report on this theme is considered unnecessary. The issue of waste management is referenced in other parts of the SPD, and also applications will need to respond to the requirements of the Waste Local Plan.	No	No
Merseyside Environmental Advisory Service	EH5 Reference should be made to Local Plan Core Strategy Policy CS8	Agreed- this can be incorporated into EH5	Incorporated referenced to Local Plan policy CS8 within EH5.	No
Merseyside Environmental	EH7 Should read 'surface and foul water	Agreed – this can be added to EH7	Incorporated reference to waste	No

Other respondent	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
Advisory Service	removal and waste management'		management within EH7 part 5	
Merseyside Environmental Advisory Service	EH10 add a point 6) opportunities to provide features which are beneficial to wildlife and which can enhance biodiversity - for example bat roosts and bird boxes where appropriate- should be identified within the masterplan	Agreed – this can be incorporated into EH10. This issue was also raised by Natural England.	New point in EH10 added: "Informed by evidence at the masterplan and/or the planning application stage, development should provide ecological mitigation, including where appropriate within built structures (such as bat roosts and bird boxes), along with other appropriate measures to enhance biodiversity in the urban environment."	No
Merseyside Environmental Advisory Service	EH11 The policy covers renewable energy, sustainable design and sustainable waste management. This is welcomed.	Noted.	No	No
Merseyside Environmental Advisory Service	Table 11.2, part b Local Plan Core Strategy Policy CS8 should be included in addition to Policy CS21.	Noted, this is a direct copy from a table in the Local Plan Core Strategy so not appropriate to amend at this time.	No	No

Other respondent	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
Merseyside Environmental Advisory Service	**Masterplan** Page 18, Table 3.1 This section gives the impression that archaeological interest in the site is limited and/or dealt with. This is not the case - the need for an Archaeological and Heritage Assessment to accompany any planning application is identified on page 207 - Preliminary Application submissions -preliminary list- it would be helpful if this requirement were given more prominence. Advice regarding the masterplan baseline data (MEAS memo dated 26 July 2018) indicated the need for pre-determination archaeological evaluation of the site through a variety of non-intrusive and intrusive techniques in order to establish the exact nature and extent of the archaeological resource, both above- and below-ground, across the site. I advise that the need for, and timing of, such work within the development process be given more prominence within the masterplan. The Council may wish to make such work a required pre-determination stage of work or consider that it could be undertaken post-permission but pre-	Noted. Table 3.1 can be updated to reflect the need for more information on archaeology to be provided. Further clarity can be provided within the masterplan to explain the extent of evidence required to support planning applications.	No	Updated masterplan Table 3.1 to clarify extent of archaeological evidence needed to support planning applications.

Other respondent	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
	commencement. NPPF is however clear that archaeological potential should be addressed as part of any assessment stage. The SPD in EH2 3(d) would seem to infer that such work is required pre-determination so that it can inform the masterplan by identifying constraints, impact and propose mitigation - this is not currently the case for archaeology. It would therefore be useful if it were stated that the technical reports considered necessary to better understand any below-ground archaeological constraints relate to geophysical survey and trial trenching.			
Merseyside Environmental Advisory Service	P28, policy context Reference to the Merseyside & Halton Waste Local plan is welcomed.	Noted	No	No
Merseyside Environmental Advisory Service	P33, para 4.20 Specific reference to Policy WM8 and Policy WM9 of the Merseyside & Halton Waste Local plan is welcomed.	Noted	No	No
Merseyside Environmental Advisory Service	P117, refuse collection The requirements identified with respect to refuse storage/collection are welcomed.	Noted	No	No
Merseyside Environmental Advisory	P162, para 6.93 The requirement for development proposals to be accompanied by an	Noted	No	No

Other respondent	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
Service	Energy/Sustainability Statement is welcomed.			
Merseyside Environmental Advisory Service	P164, development sustainability I welcome the inclusion of the sustainability and waste initiatives within the macroscale sustainability opportunities.	Noted	No	No
Merseyside Environmental Advisory Service	P166, development sustainability The microscale opportunities include numerous initiatives which are welcomed, such as building orientation and roof design, and waste reduction/reuse opportunities. A more explicit reference to renewable and low carbon energy would also be useful. Only solar pv is mentioned.	Noted. Additional opportunities for renewable and low carbon energy can be included here, along with a reference to the Council's climate change emergency declaration.	No	Updated masterplan to reflect additional opportunities for renewable and low carbon energy, and reference to the Council's climate change emergency declaration.
Merseyside Environmental Advisory Service	Page 189, figure 6.66 Ditton Brook NIA flood storage area/enhancement. Unclear whether dry meadow area will be planted with wildflower. Ensure suitable planting of dry meadow to benefit farmland birds due to area lost to development.	We acknowledge that the Masterplan needs to provide further clarification as to the role and function of the NIA / FSA, including in terms of the appropriate planting for this area.	No	The final masterplan provide further clarification as to the role and function of the NIA / FSA, including appropriate planting.
Merseyside Environmental Advisory Service	Northernmost Parcel 1 (MDH) adjacent to Netherley Brook LWS (part of NIA). Extend river corridor enhancements to include Netherley Brook adjacent to Parcel 1 (MDH)	We agree that the extent of ecological mitigation and corridor enhancements can be extended along the Ditton Brook corridor to the north, including the MDH parcel.	No	Masterplan includes extension of corridor enhancement to the north.
Merseyside	P206, planning application	Noted.	No	No

Other respondent	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
Environmental Advisory Service	submissions The requirement for a detailed EIA to be prepared for each red line boundary together with a high level EIA covering the whole of the East of Halewood site is welcomed.			
Merseyside Environmental Advisory Service	Page 207, planning application submissions Given the potential sources of land contamination and the sensitivity of the allocated land use (residential) we support the requirement for submission of a Land Contamination Assessment with any future planning applications. This should identify any potential sources, pathways and receptors as well as a preliminary risk assessment to identify any potential unacceptable risks. If unacceptable risks are identified, a site investigation will be required to determine the land contamination status of the site and what mitigation measures may be required.	Noted. Further detail about the requirements of Land Contamination Assessment for inclusion with applications can be provided to applicants. This may be most appropriately reflected in the constraints section – updated geo-environmental section.	No	Update Table 3.1 with requirements for contamination assessment at application stage, also reflected in implementation and delivery section.
Merseyside Environmental Advisory Service	On the whole the SPD and masterplan are acceptable from an ecological perspective and are consistent with the policies of the Local Plan.	Noted and welcomed.	No	No
Merseyside Environmental Advisory	HRA updated HRA to accompany final version of SPD and Masterplan	Noted. This has been actioned and an updated HRA screening will accompany the final SPD.	Final SPD reflects availability of updated HRA	No

Other respondent	Detailed comments	Council response	Changes to the SPD	Changes to the Masterplan
Service			screening assessment.	
Merseyside Environmental Advisory Service	General awareness of mandatory Net Gain set for inclusion within forthcoming Environment Bill	Noted. The Council is aware of this future change but the Environment Bill is yet to be progressed through Parliament.	No	No

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