



Knowsley Council

Knowsley Local Plan: Core Strategy

Statement of Previous Consultation

July 2013

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THIS REPORT SHOULD BE READ IN CONJUNCTION WITH THE FOLLOWING PUBLICATIONS:

- **Knowsley Core Strategy Issues and Options Paper: Report of Consultation (March 2010)**
- **Knowsley Core Strategy Preferred Options Report: Report of Consultation (December 2011)**
- **Knowsley Local Plan Core Strategy: Accounting for Preferred Options Consultation (November 2012)**
- **Knowsley Local Plan Core Strategy: Report of Representations Made (July 2013)**

PART A – INTRODUCTION

1. Role of this document

- 1.1 This document sets out the details of publicity and consultation undertaken to prepare and inform the Knowsley Local Plan Core Strategy (hereafter referred to as the **Core Strategy**).
- 1.2 This Statement has been prepared by the Council as local planning authority to meet the requirements of Regulation 22(1) (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012. This regulation requires a statement to be prepared setting out how the Council has complied with Regulations 18 and 20 of the same Regulations in the preparation of the Core Strategy.
- 1.3 This Statement should be read in conjunction with the following documents:
- Knowsley Core Strategy Issues and Options Paper: Report of Consultation (March 2010)
 - Knowsley Core Strategy Preferred Options Report: Report of Consultation (December 2011)
 - Knowsley Local Plan Core Strategy – Accounting for the Preferred Options Consultation (November 2012)
 - Knowsley Core Strategy Proposed Submission Document – Report of Representations Made (July 2013)
- 1.4 Throughout the plan preparation process, the Council has made extensive efforts to engage relevant agencies and the local community in the formulation and refinement of the policies and proposals in the Core Strategy. At each stage, the Council has adhered to the standards for consultation set out in the Statement of Community Involvement (SCI)¹, as well as those set by legislation and guidance. In many instances, the Council has gone beyond these minimum standards. This has included publicising consultation, inviting representations to be submitted and using those comments received to identify and address key issues within the Core Strategy.
- 1.5 The Town and Country Planning (Local Planning) (England) Regulations 2012 (Regulation 22(1)(c) subparagraphs (i) to (iv)) require the Council, when submitting the Core Strategy to the Secretary of State, to publish a statement setting out:
- which bodies and persons were invited to make representations under regulation 18;
 - how those bodies and persons were invited to make such representations;
 - a summary of the main issues raised by those representations; and

¹ Knowsley Statement of Community Involvement (Knowsley MBC, 2007)

- how those main issues have been taken into account.
- 1.6 Regulation 22(1)(c) subparagraphs(v) and (vi) of the same Regulations require that, at the same stage, the Council must also prepare a statement setting out:
- whether representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations.
- 1.7 **Part A** (comprising chapters 1-4) of this statement summarises how the Council publicised the Core Strategy process, consulted and engaged with all consultation bodies at the "Issues and Options" and "Preferred Options" stages, both of which have been treated as comprising the consultation required under Regulation 18. This Part also explains how this process met (or exceeded) the requirements of the Knowsley SCI and national legislation. Part A should be read in conjunction with the Reports of Consultation for the Issues and Options and Preferred Options stages (see paragraph 1.3 above).
- 1.8 **Part B** (comprising chapters 5-8) of this statement explains how the Council took into account and/or addressed issues raised through representations at the Regulation 18 stage of consultation in preparing the Core Strategy, focussing on the Preferred Options stage. Part B should be read in conjunction with the aforementioned Reports of Consultation and the document entitled "Knowsley Local Plan Core Strategy: Accounting for the Preferred Options Consultation".
- 1.9 **Part C** (comprising chapters 9-11) of this statement sets out the number of representations made at the Regulation 20 stage, and summarises the main issues raised in these representations. This section relates to the responses made to consultation on the Proposed Submission version of the Core Strategy (in November - December 2012). Part C should be read in conjunction with the report entitled: "Knowsley Core Strategy Proposed Submission Document – Report of Representations Made".

2. The Legal Requirements

- 2.1 The preparation of the Knowsley Local Plan Core Strategy has spanned two planning frameworks – initially that of the Local Development Framework (LDF). This changed to the Local Plan system as a result of changes to legislation and the publication of the National Planning Policy Framework (NPPF) in 2012. Consultation that was undertaken under the LDF system also applies to the preparation of the Local Plan Core Strategy and directly informed its evolution.
- 2.2 Preparation of the Knowsley Local Plan Core Strategy has fallen under two sets of legislation and guidance:
- The Planning and Compulsory Purchase Act 2004, the Town and Country Planning (Local Development) (England) Regulations 2004

(which themselves were amended in 2008) and Planning Policy Statement 12 (PPS12); and

- The Localism Act 2011 (which amended certain sections of the 2004 Act), the Town and Country Planning (Local Planning) (England) Regulations 2012 and the National Planning Policy Framework (NPPF).

- 2.3 All the consultation relevant to Regulation 18 of the 2012 Local Planning Regulations was conducted when Regulation 25 of the 2004 Local Development Regulations (as amended in 2008) was still in effect and prior to the publication of the 2012 Local Planning Regulations. The consultation which was conducted also fulfils the requirements of Regulation 18 of the 2012 Local Planning Regulations.
- 2.4 All the consultation relevant to Regulation 20 of the 2012 Local Planning Regulations was conducted after the publication of these regulations, and has complied fully with these.
- 2.5 Each set of regulations state that the Council, in its role as local planning authority, must notify a range of agencies, organisations and individuals at each stage of the Local Plan preparation and invite them to submit representations on its content. These representations must then be considered in the development of the Local Plan.
- 2.6 Those bodies to be notified have included regulatory agencies, physical infrastructure delivery agencies, social infrastructure delivery agencies, major landowners, house builders and developers, minerals and waste management agencies, voluntary bodies, neighbouring local planning authorities, county councils and parish councils. The Council has also publicised each consultation stage and invited representations from the public, including Knowsley residents and any other groups or organisations.
- 2.7 The regulations required the Council to make available the Local Plan document and supporting documentation at their principal office and at other places within their area, and publish the documents on the Council's website for the duration of each consultation stage.
- 2.8 These requirements are the minimum for consultation and the Council's Statement of Community Involvement (SCI) establishes more detailed guidelines for engagement. The Knowsley SCI sets out the Council's standards and policies for involving the community in the planning process. It lists the different groups with which the authority intended to consult and describes the various methods to be used to engage and communicate with people. The Council is required to meet the standards set out in the SCI in all consultations related to local planning policy documents.

3. Stages of Consultation

- 3.1 The Local Plan Core Strategy preparation process has involved a number of stages and at each stage the Council has actively sought input from consultees to help shape the policies within the Plan. This section explains the publicity and consultation methods used at each stage to encourage active involvement in the Local Plan.
- 3.2 To support consultation on Local Plan documents, the Council maintains a database containing details of all consultees. This database accords with the list of consultees provided in the SCI and is regularly updated. As and when further bodies or individuals make representations, their details are also added to the database for future use. People are also able to register on the database through the Council website or by contacting the Local Plan team (or to opt out of inclusion).
- 3.3 The consultation database is used for all mail-outs related to consultation on local planning policy documents.
- 3.4 Table 1 below shows the stages of consultation for the Knowsley Local Plan Core Strategy. These stages are explained in more detail in the following paragraphs.

Table 1 – Stages of Consultation for the Core Strategy

Regulation ²	Stage	Process	Timing
n/a	Initial Engagement	Stakeholder workshops (Plan Knowsley), consultation on early evidence base	2008 – 2009
18	Issues and Options	Statutory consultation on potential approaches to spatial strategy and thematic policies	November 2009 – January 2010
18	Preferred Options	Statutory consultation on preferred policy options and discounted alternatives	June 2011 – September 2011
19/20	Proposed Submission Document	Statutory consultation on final Core Strategy document	November 2012 – December 2012

Initial engagement

- 3.5 The **Plan Knowsley Workshops** were a series of interactive stakeholder engagement workshops facilitated by Vision Twentyone on behalf of Knowsley Council during July 2008. The primary objective of the ‘Plan Knowsley’ workshops was to establish an initial understanding of the views of key local stakeholders, working towards the creation of a vision for the emerging Core Strategy. Reports

² Of the Town and Country Planning (Local Planning) (England) Regulations 2012

summarising the findings of the workshops were published in August 2008.

- 3.6 Additional informal stakeholder involvement was undertaken with a wide variety of colleagues and partners within the Council and the Knowsley Partnership (which is the Local Strategic Partnership for Knowsley) during the initial stages of Core Strategy preparation.

Issues and Options

- 3.7 Between late 2008 and mid 2009, the Council drafted the first consultation paper concerning the Core Strategy: known as the **Issues and Options Paper**³. The document presented key issues facing the Borough and potential policy options to deal with these. The drafting of the Paper drew on available evidence and feedback from the initial consultation exercises undertaken. The central issue consulted on through the Paper was the how the spatial strategy for the Borough could be progressed, while accommodating the competing priorities identified through the evidence base and national and regional policy. Approval to publish the Issues and Options Paper for a period of public consultation was granted by the Knowsley Cabinet at its meeting on 14th October 2009.

- 3.8 The formal period of public consultation was undertaken from November 2009 until January 2010. This represented consultation in accordance with Regulation 25 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 (the appropriate regulations at the time). The activities associated with this period of public consultation accorded with and exceeded the requirements of the Knowsley Statement of Community Involvement, as the Council sought to engage with as many local people and stakeholders as possible in this early stage of Core Strategy preparation. The consultation focused on the content of the Issues and Options Paper, and in particular on presenting policy options for tackling the strategic challenges in Knowsley. This included a potential spatial vision, strategic objectives and spatial strategy for the development of the Borough, alongside a range of policy options for dealing with area-based and theme-based issues. A summary leaflet was produced, which focused on the spatial strategy, including the three potential broad spatial options which the Council sought feedback on.

- 3.9 The Issues and Options consultation phase included a wide range of consultation methods, including:
- Events – in libraries, leisure centres and One Stop Shops
 - Presentations – to partnership meetings; to specialist groups; to local Councils; to internal officer groups.

³ Knowsley Core Strategy – Issues and Options Paper (Knowsley MBC, 2009)

- Publication of materials – in Council libraries and One Stop Shops; on the Council's website
- Information dissemination – summary leaflets sent to all households; communication on business newsletter; public notice; press coverage
- Direct communications – letters and emails to LDF consultation database
- Online consultation – use of consultation portal; use of Council website; use of social networking facilities

3.10 The consultation period resulted in a wide range of responses, which are detailed in the Core Strategy **Issues and Options – Report of Consultation**⁴. This report summarises the responses made to the summary leaflet and full document, and feedback from discussions held at various internal and external consultation events which the Council held with a wide variety of groups and organisations. In particular, both qualitative and quantitative feedback was given regarding the broad spatial options which featured in the full Issues and Options Paper and in the supporting Summary leaflet. This influenced the development of the spatial strategy to a large degree, indicating which of the options was preferred by the majority of stakeholders who responded to the consultation. Additional feedback also influenced different elements of the Core Strategy, such as the selection of regeneration priorities, and the introduction of potential new policy areas, such as for affordable housing.

Preferred Options

- 3.11 Following the Issues and Options stage, the Council drafted a **Preferred Options Report**⁵. This Report drew on the findings of the Issues and Options consultation, results of initial technical assessments, as well as additional evidence collated by the Council. The Report also had to respond to changing circumstances, both in terms of national and regional policy and also rapidly changing economic conditions. The Preferred Options Report presented a draft spatial strategy and a range of preferred policy approaches for consultation purposes. The Report made it clear why alternative policy options had been rejected and included a range of supporting text which supported and justified the policy approaches put forward by the Council. The Council's Cabinet approved the Preferred Options Report on 8th June 2011 to be published for a period of consultation.
- 3.12 A formal period of consultation on the Preferred Options Report was undertaken from June 2011 until September 2011. This formed in essence a second phase of consultation under Regulation 25 of the Town and Country Planning (Local Development) (England)

⁴ Knowsley Core Strategy Issues and Options Paper – Report of Consultation (Knowsley MBC, 2010)

⁵ Knowsley Core Strategy Preferred Options Report (Knowsley MBC, 2011)

(Amendment) Regulations 2008 (following on from the Issues and Options Paper consultation already referred to) and was undertaken in accordance with those Regulations.

- 3.13 As for the Issues and Options consultation, the activities associated with this period of public consultation accorded with and exceeded the requirements of the Knowsley Statement of Community Involvement. At this important stage of consultation, the Council sought to engage with as many local people and stakeholders as possible. The Preferred Options Report itself was in the form of a draft Core Strategy, including a vision, strategic objectives and a range of “preferred policy options”, including for spatial strategy policies, area-based regeneration policies and thematic policies. Each policy was supported by a range of alternative but discarded options, as well as supporting materials about how the implications of the previous Issues and Options stage have been taken into account. The consultation focused on the content of the Preferred Options Report and in particular on the preferred spatial strategy and its potential impacts on Knowsley’s townships. This was reflected in a summary leaflet which was produced to support the consultation, which included the preferred spatial strategy, key diagram and area priorities, as well as details of how to participate in the consultation.
- 3.14 The Preferred Options consultation used a wide range of methods including:
- Events – in town centres including Kirkby, Prescot, Huyton, Halewood and Whiston
 - Presentations – to partnership meetings; to specialist groups; to internal officer groups; to local Town and Parish Councils
 - Publication of materials – in Council libraries and One Stop Shops; on the Council’s website
 - Information dissemination – summary leaflets sent to all households; communication on business newsletter; public notice; press coverage
 - Direct communications – letters and emails to consultation database
 - Online consultation – use of consultation portal; use of Council website; use of social networking facilities
- 3.15 The consultation period resulted in a wide range of responses, which are detailed in the Core Strategy **Preferred Options – Report of Consultation**⁶. This summarises the responses made to the summary leaflet and full Preferred Options Report document, and to key supporting documents such as the draft Green Belt Study – Knowsley Report.

Proposed Submission

⁶ Knowsley Core Strategy Preferred Options Report: Report of Consultation (Knowsley MBC, 2011)

- 3.16 Following on from the consultation on the Preferred Options Report, in late 2011, the Council began drafting the **Proposed Submission Document**⁷. This is similar to the version of the Core Strategy which the Council will seek to progress through Examination to adoption. The drafting process drew on the findings of the Preferred Options consultation, including the production of key documents which detailed the Council's response to the main issues raised by those responding to the consultation. The process also included accounting for the recommendations arising from the interim technical assessments including the Sustainability Appraisal and Habitats Regulation Assessment. During this phase, the Council also prepared further elements of its Core Strategy evidence base, with the findings of new studies and technical reports feeding into the Proposed Submission version of the Plan. Again, the Council had to account for a range of changes at the national level in drafting the final policies for example the publication of the National Planning Policy Framework (March 2012).
- 3.17 Knowsley Council granted approval to publish the Local Plan Core Strategy and subsequently submit the document to the Secretary of State for Examination at its full Council meeting on 19th September 2012. Consultation was undertaken on the Proposed Submission Version between 8 November and 21 December 2012. The first version of this Statement of Consultation was published at the start of this consultation period.
- 3.18 Following this final consultation period the Council has collated representations received, summarised the key issues raised and prepared these to be submitted to the Secretary of State under Regulation 22. They will be made available as key materials for the Examination in Public of the Local Plan Core Strategy. This statement has been prepared to meet the requirements of Regulation 22(1)(c), while a separate document, entitled "Knowsley Local Plan Core Strategy: Report of Representations Made" has been published providing copies of all of the representations received, in accordance with Regulation 22(1)(d). Part C of this report contains further information about this process.

Summary of Consultation Methods

- 3.19 Table 2 shows a summary of the consultation methods used at each stage of formal consultation on the Local Plan Core Strategy, including the categories of consultation methods required by the SCI. Further detail for the Issues and Options and Preferred Options stages are given within their respective Reports of Consultation, as previously noted.

⁷ Knowsley Local Plan Core Strategy Proposed Submission Version (Knowsley MBC, 2012)

Table 2. Summary of Consultation Methods Used

Consultation / Publicity	Undertaken at Stage			
	Early Engagement	Issues and Options	Preferred Options	Proposed Submission Document
Council Website		✓	✓	✓
Other electronic forms of Consultation – Facebook, Twitter, Intranet		✓	✓	✓
Emails and formal letters		✓	✓	✓
Documents sent to selected organisations and individuals		✓	✓	✓
Stakeholder meetings – Members, Partnerships, Committees	✓	✓	✓	✓
Local Public Forums – Town & Parish Councils, Area Partnership Boards		✓	✓	✓
Exhibitions, displays and road shows		✓	✓	
Documents for inspection at Council Offices and libraries.		✓	✓	✓
Leaflets and brochures		✓	✓	
Statutory notices in press		✓	✓	✓
Media press and broadcasting		✓	✓	✓
Questionnaires and surveys		✓	✓	
Newspapers		✓	✓	✓

4. Bodies Invited to Make Representations

- 4.1 The Knowsley SCI (at Appendix 1 of that document) contains a list of those bodies and organisations that were to be consulted through the Local Plan stages. This included statutory, general and other consultees.
- 4.2 These consultees were registered in the consultation database, along with those people who had submitted representations in earlier stages of the Core Strategy or Supplementary Planning Documents (SPDs), as well as others who had registered on the database to be kept informed of progress with the Local Plan. New consultees submitting representations at each stage, where a name and contact details were given, were automatically added to the database.
- 4.3 All those included in the consultation database were notified of consultation through a postal or email mail-shot at each stage of the Local Plan's preparation. These shots explained that: consultation was about to commence; what the consultation was on; the duration of consultation (including start/end dates); and how consultees could find out more and submit comments or representations.

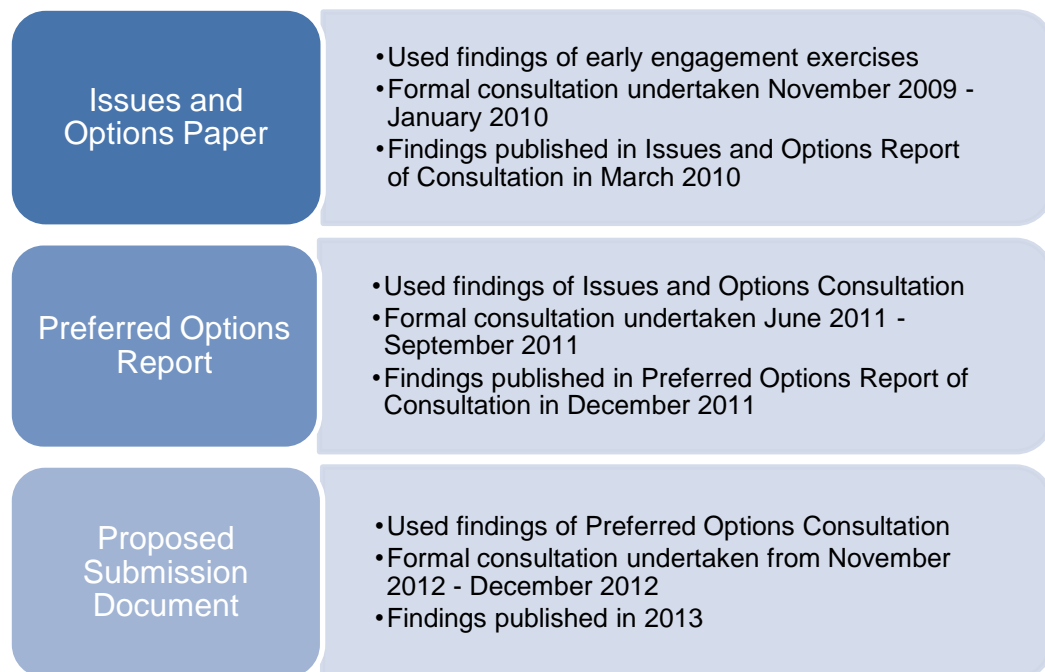
- 4.4 As at July 2013, the consultation database contained approximately 700 entries. All consultees can 'opt-out' of receiving further information from the Council at any time.
- 4.5 In addition to the consultation database, further groups were invited to make representations. The Council's employment team hold a database of businesses in Knowsley, and the Local Plan team was able to include items on the monthly business newsletter which reaches these businesses.
- 4.6 In addition, for selected stages of consultation, namely the Issues and Options and Preferred Options stages, summary leaflets were mailed to each residential address in Knowsley. Over 60,000 leaflets were delivered at each of these stages. Further invitations to comment were made to residents, businesses and other stakeholders through a variety of methods, including attendance at road show events, workshops and other events. Posters in public places, website updates, Facebook and Twitter feeds also publicised consultation periods and encouraged bodies to respond.
- 4.7 Appendix 1 shows the list of those bodies the Council is obliged to contact to invite to make representations on the Local Plan Core Strategy. The membership of this list has changed as the Core Strategy has been progressed, based on changes to national legislation and policy. The list given at Appendix A represents the list as at November 2012, and hence those consulted in this way for the Proposed Submission consultation at that date. Additional lists relating to those bodies contacted at the Issues and Options and Preferred Options stages are available within the Reports of Consultation for these stages of consultation.
- 4.8 Appendix 2 shows the list of bodies, in addition to those listed at Appendix 1, present on the Knowsley Local Plan consultation database, again as it was in November 2012 and hence which was used for the Proposed Submission consultation. These are businesses, organisations, agencies and private individuals who have either specifically requested to be added, or have been added as a result of their involvement in previous consultations on Knowsley Local Plan documents. The names of organisations / individuals only are given, to protect information relating to addresses and email contact details being made available. Additional communications were also sent to addresses of those who signed petitions at the Preferred Options stage, although these households were not specifically included in the formal consultation database as they had not requested such an addition.

PART B –MAIN ISSUES RAISED BY THE REPRESENTATIONS AT REGULATION 18 STAGE AND HOW THESE HAVE BEEN TAKEN INTO ACCOUNT

5. Introduction

- 5.1 This part of the Statement of Previous Consultation sets out how the Council has summarised the main issues raised as a result of consultation on the emerging Core Strategy, and has taken these issues into account during subsequent stages of plan preparation. It satisfies the requirements of Regulation 22(1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 which requires the inclusion of such a statement in the documents which are submitted with a Local Plan document.
- 5.2 As set out in Part A of this Statement the Council has undertaken several distinct stages of consultation in preparing the Knowsley Local Plan Core Strategy. At each of these stages, a range of parties were formally invited to submit comments on the consultation documents. The stages are set out in figure 1.

Figure 1. Influence of different stages in preparation of Core Strategy



- 5.3 The method used by the Council to collate and summarise responses, and accounting for the main issues raised in subsequent stages is set out in sections 6,7 and 8 below.

6. Issues and Options to Preferred Options stages

- 6.1 The Issues and Options Paper (consulted on from November 2009 until January 2011) invited comments on a wide range of issues which the Council anticipated would be dealt with in the Core Strategy, and policy options which could be used to respond to these issues. Figure 2 below provides an example of how the Issues and Options Paper set out a strategic issue and choices of how the issue may be addressed.

Figure 2. Extract from Issues and Options Paper (page 32)

The figure is a structured layout with three main sections. The top section is a pink box containing the title 'Issue ST 3' and the heading 'FUTURE ROLE OF KNOWSLEY'S TOWNSHIPS'. Below this is a question: 'Do you agree that Huyton, Kirkby, Prescott/Whiston and Halewood should each be identified as "larger suburban centres" within which new development and interventions will be encouraged as set out above?'. The middle section is a light blue box titled 'Option ST3. 1' with the text: 'Yes, Huyton, Kirkby, Prescott/Whiston and Halewood should each be identified as "larger suburban centres".'. The bottom section is another light blue box titled 'Option ST3. 2' with the text: 'No, Huyton, Kirkby, Prescott/Whiston and Halewood should not be identified as "larger suburban centres".'.

Issue ST 3

FUTURE ROLE OF KNOWSLEY'S TOWNSHIPS

Do you agree that Huyton, Kirkby, Prescott/Whiston and Halewood should each be identified as "larger suburban centres" within which new development and interventions will be encouraged as set out above?

Option ST3. 1

Yes, Huyton, Kirkby, Prescott/Whiston and Halewood should each be identified as "larger suburban centres".

Option ST3. 2

No, Huyton, Kirkby, Prescott/Whiston and Halewood should not be identified as "larger suburban centres".

- 6.2 The Council's subsequent Report of Consultation⁸ for the Issues and Options Paper accounts for the consultation responses which were submitted via leaflet return, letter, email and the consultation portal. Separate sections in the Report of Consultation relate to: a) written and online responses to the Issues and Options Paper and Summary Leaflet; and b) issues raised during consultation events. These sections were ordered in accordance with policy issues. The bulk of the Report focuses on the responses to the questions posed in the Issues and Options Paper. Figure 3 is an extract from the Issues and Options Paper: Report of Consultation showing how responses to the corresponding issue were reported.

⁸ Knowsley Core Strategy Issues and Options Paper: Report of Consultation (Knowsley MBC, 2010)

Figure 3. Extract from Knowsley Core Strategy Issues and Options Paper: Report of Consultation, page 42

Issue ST3			Issue Totals
Do you agree that Huyton, Kirkby, Prescott/Whiston and Halewood should each be identified as “larger suburban centres” within which new development and interventions will be encouraged as set out above?	ST3.1: Yes, Huyton, Kirkby, Prescott/Whiston and Halewood should each be identified as “larger suburban centres”.	ST3.2: No, Huyton, Kirkby, Prescott/Whiston and Halewood should not be identified as “larger suburban centres”.	
Supportive Comments	4	0	4
Other Comments	0	0	0
Non-Option Specific	-	-	1
Total Comments	4	0	5
% Supportive per Option Comments	100	0	
% of Overall Options Supported	100	0	
% Total Comments / ST3 Total	80	0	

- 6.3 In addition to the quantitative analysis shown in Figure 3, the Council carefully reviewed the detailed content of the responses submitted during the Issues and Options consultation in drafting the subsequent Preferred Options Report. This included considering how the issues raised would affect the development of preferred policy options. The nature of the questions asked at the Issues and Options stage meant that the responses given to the written consultation and at consultation events were mainly in the form of suggestions and ideas and expressions of a preference for an approach rather than comments on clear policy directions. This meant that the Council did not consider it appropriate to give a detailed response to these issues, but rather review and consider them in detail in developing the preferred policy options for each issue.
- 6.4 To this end, the Preferred Options Report (2011) contained, for each policy area, the primary and secondary links with the Issues and Options Paper. The main issues raised at the Issues and Options stage were listed beneath the preferred policy wording, under the heading of “Summary of Issues and Options Consultation Responses”. The section included bullet points of the main points raised. This enabled readers to compare the approach with the main issues raised at the previous stage, and determine how the Council considered these views in drafting the Preferred Options Report.

- 6.5 An example of this is given in the extract from the Preferred Options Report in Figure 4 below. This shows the primary and secondary linkages with parts of the Issues and Options Paper and a summary of the detailed comments made at the Issues and Options stage. This “Policy Progression” section also summarised the main issues raised in response to consultation on the Sustainability Appraisal which had also been undertaken at the same time.

Figure 4. Extract from Knowsley Core Strategy: Preferred Options Report (pg 85)

Policy Progression 6			
Policy Progression - Preferred Option CS6			
Primary Linkage to Issues & Options Policy Areas	ST7	Secondary Linkages to Issues & Options Policy Areas	ST3; ST12; ST13; ST14; ST15; TH4
Summary of Issues & Options Consultation Responses	<ul style="list-style-type: none"> • Consideration of the context of PPS4 advice would be important in establishing a retail hierarchy and if seeking to enhance the retail function of the town centres within the Liverpool City Region. • All existing town centres should aim to increase the diversity of town centre uses, including consideration of the contribution of residential, educational and employment development. • Improvements to the design and layout of town centres should be supported. • Enhancement of local character should be supported, to bring about benefits for the natural environment. • There is a need to address the imbalance of retail provision within Knowsley – Huyton has recent town centre development / improvements and Prescott has the successful Cables Retail Park – and hence there is a need to direct investment to Halewood and Kirkby. • Kirkby Town Centre should be accepted as a regeneration priority with retail provision commensurate in scale with its role and function as a town centre within Knowsley and should not harm other town and district centres in adjacent Authority areas. • Halewood currently lacks retail provision, with the vast majority of retail expenditure leaking to areas outside the Borough and hence there is a critical need for new development to be brought forward at Ravenscourt. • Consideration should be given to Chapter 4 of the PPS4 Practice Guidance ‘Planning for Town Centres’ for advice on developing appropriate strategies. 		

7. Preferred Options to Proposed Submission

- 7.1 The Knowsley Core Strategy Preferred Options Report was consulted on from June to September 2011. The Report set out preferred policy

approaches covering a wide range of topics. Each preferred policy option was accompanied by supporting information, which included a summary of the alternative policy options considered by the Council and an explanation of why these were discounted. Following the end of the Preferred Options consultation period, the Council prepared a further Report of Consultation⁹. This accounts for the range of responses that were submitted via leaflet return, letter, email and the consultation portal.

- 7.2 The Report of Consultation is set out in a number of sections summarising responses to: a) the Preferred Options summary leaflet, b) the full Preferred Options Report and c) the supporting documents published alongside the main Report such as the draft Green Belt study. The full text of all written responses to the main Report was made available on the Council's consultation portal.
- 7.3 Some of the policy areas within the summary leaflet and Preferred Options Report prompted a significant level of response in terms of the number and detail of representations received. This included detailed arguments either objecting to or in support of the chosen policy approach. Given the formality of the Preferred Options stage, the Council considered it necessary to formally respond to the issues raised. This exercise aimed to identify whether any arguments put forward through the consultation would result in a change to the policy direction set out in the Preferred Options Report. In addition, where an argument suggested an alternative approach but this was not considered to be appropriate, the Council considered it necessary to explain why the policy had not been changed. This process explains how the Council took the main issues raised into account in drafting the Proposed Submission Version of the Plan. A separate document, "Knowsley Core Strategy: Accounting for the Preferred Options Consultation"¹⁰ sets out this process, and is explained in further detail below.
- 7.4 The main issues raised for each of the Core Strategy policy areas (i.e. CS1, CS2, etc.) are listed in table form in the "Accounting for the Preferred Options Consultation" document. These are referenced with paragraph numbers from the Report of Consultation, to ease read-across between the two documents. For each issue, the "Accounting for the Preferred Options Consultation" document explains whether the issue raised resulted in a change being made to the Core Strategy (i.e. with a "yes" or a "no") as progress was made from Preferred Options to the Proposed Submission version. Explanatory text also sets out why a change has or has not been made. In some cases, the main issue raised does not request a change, or does not raise matters which are relevant to spatial planning and the Core Strategy. In these cases, the

⁹ Knowsley Core Strategy Preferred Options Report: Report of Consultation (Knowsley MBC, 2011)

¹⁰ Knowsley Core Strategy: Accounting for the Preferred Options Consultation (Knowsley MBC, 2012)

Council has explained why it is not necessary to account for the response.

- 7.5 A further table within the “Accounting for the Preferred Options Consultation” document lists the responses to the Preferred Options Report summary leaflet. These are treated in a similar manner to the above, with a response as to whether the points raised have resulted in a change to the Core Strategy and text explaining the Council’s position. A proportion of the responses received in this way are not relevant to the Core Strategy and pick up on other local issues, for example progress with a particular development scheme, or another Council service area. Full responses have also been made to these points for completeness. This document meets the requirements of Regulation 22(1)(c) (iv) of the Regulations by summarising how responses received at the Preferred Options consultation were taken into account.
- 7.6 The Council used this exercise to amend and refine the Core Strategy policies as the Proposed Submission Version was drafted during 2012. The same Core Strategy policy references (e.g. CS3) were used between the Preferred Options Report and the Proposed Submission Version, allowing a clear read across between the documents. Respondents to the Preferred Options Report are therefore able to see how their comments have been accounted for, both within the policies of the Proposed Submission Version and within the “Accounting for the Preferred Options Consultation” document. The Council also considered newly emerging policy, evidence and technical work, and the findings of assessments completed at the Preferred Options stage in drafting the Proposed Submission Version.

8. Proposed Submission Onwards

- 8.1 The Council published the Core Strategy Proposed Submission Document for a period of formal consultation from November 2012 to December 2012. The document was supported by a range of evidence, Technical Reports and other supporting documents. The Council issued comprehensive guidance notes to help respondents at this stage to frame their comments in relation to issues of legal compliance and soundness. A Statement of Representations Procedure was published which specified how and when interested parties could view the Plan and its supporting documents and submit representations (see Appendix 3 to this Statement).
- 8.2 Part C of this document explains the findings of the Proposed Submission consultation period in more detail.

PART C – REPRESENTATIONS RECEIVED AT REGULATION 19/20 STAGE

9. Introduction

- 9.1 Following the end of the consultation (under Regulation 19) on the Proposed Submission Document in December 2012, the Council logged all representations received and published these in full in a document entitled “Knowsley Local Plan Core Strategy: Report of Representations Made”. This document meets the requirements of Regulation 22(1)(d). The Council has submitted this to the Secretary of State with the Core Strategy. The Inspector appointed to lead the Examination in Public of the Plan will be able to consider the representations and the extent to which they raise issues which affect the legal compliance and soundness of the Core Strategy.
- 9.2 The process of completing this document involved several key stages:
- Receipt of responses before the deadline of 21 December 2012;
 - Labeling of responses in terms of whether they were received: via the online portal; on a representations form; or via other written communication;
 - For responses not made on the standard form or online consultation portal, coding these in accordance with the part of the Core Strategy to which they relate (in some cases, this included breaking down submissions into a number of “main issues raised” which related to specific parts of the plan – up to 16 main issues in some cases);
 - Compiling:
 - The Report of Representations Made (see paragraph 9.1 above); and
 - A "Summary of Main Issues Raised", which sets out the main issues raised by each submission, and the changes sought by the respondent (see Appendix 4 to this document).
- 9.3 These documents together meet the requirements of Regulation 22(1)(c) subparagraph (v).

10. Representations Received (Regulation 20)

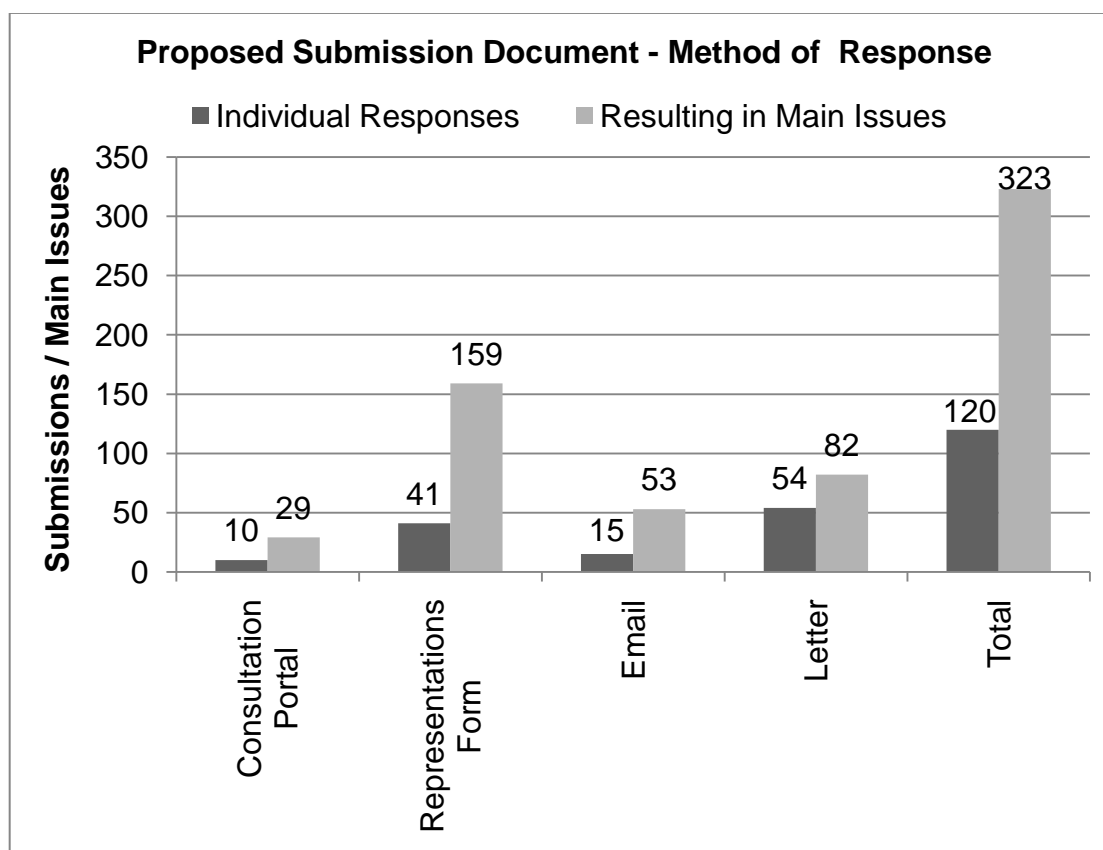
10.1 The Council received 120 responses during the Proposed Submission consultation period. No responses were received which were counted as invalid.

10.2. Of the 120 responses (as illustrated in Figure 5):

- 10 were received via the online consultation portal;
- 41 were received via the representation form;
- 15 were received via email; and
- 54 were received via letter.

10.3 The responses raised one or more main issues each (as also illustrated in Figure 5). The responses which used representation forms raised the largest number of main issues (159). The letters received contained only 82 main issues. In total the 120 submissions contained 323 individual main issues identified by the Council.

Figure 5. Proposed Submission Document: Method of Submission



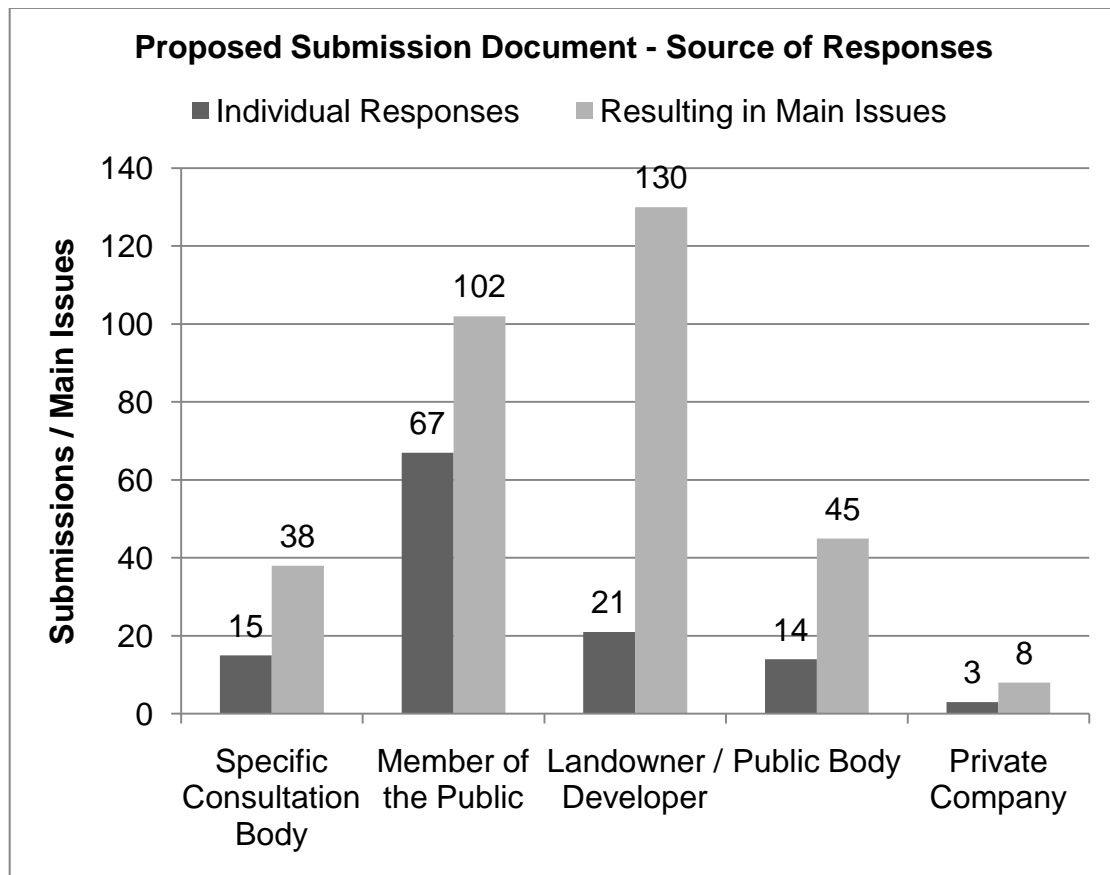
10.4 Figure 6 illustrates that of the 120 responses:

- 15 were from specific consultation bodies;
- 67 were from members of the public;
- 21 were from landowners and specific site developers;
- 14 were from other public bodies (in addition to specific consultation bodies); and

- 3 were from other private companies (not identifying themselves as landowners or specific site developers).

10.5 Figure 6 also shows the number of main issues raised by each of the types of representor. The responses by landowners and developers raised the greatest number of main issues while those by members of the public raised fewer main issues on average per submission made. These statistics reflect the comparative length and content of the responses.

Figure 6: Proposed Submission Document: Source of Responses

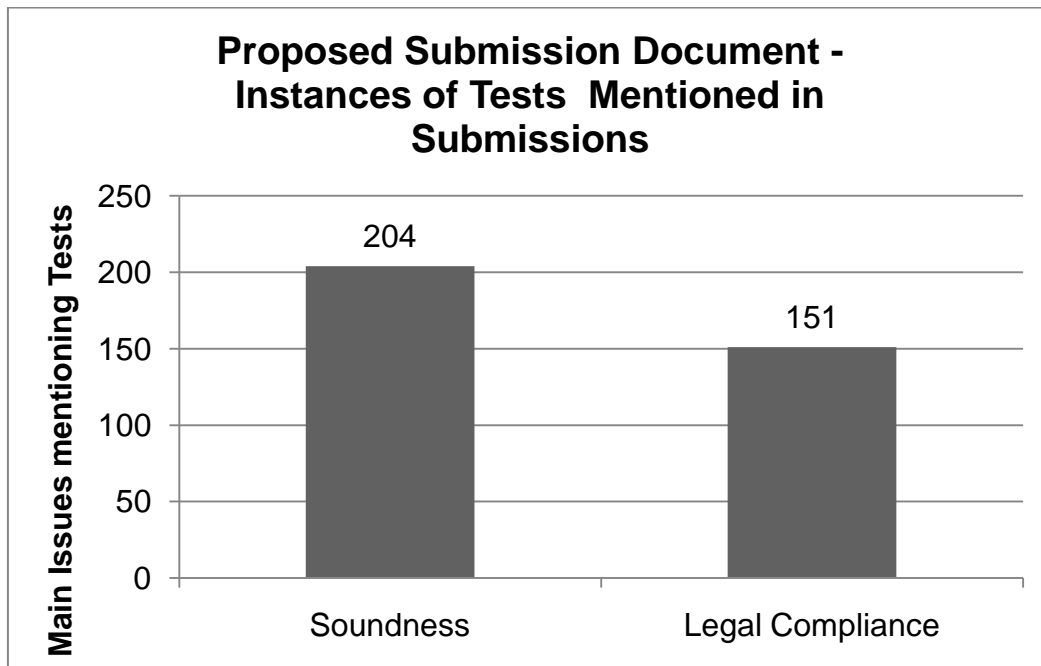


10.6 Many of the main issues in the responses concerned specific legal and soundness tests. Figure 7 shows that of the main issues raised:

- 151 related to legal compliance issues; and
- 204 related to soundness tests

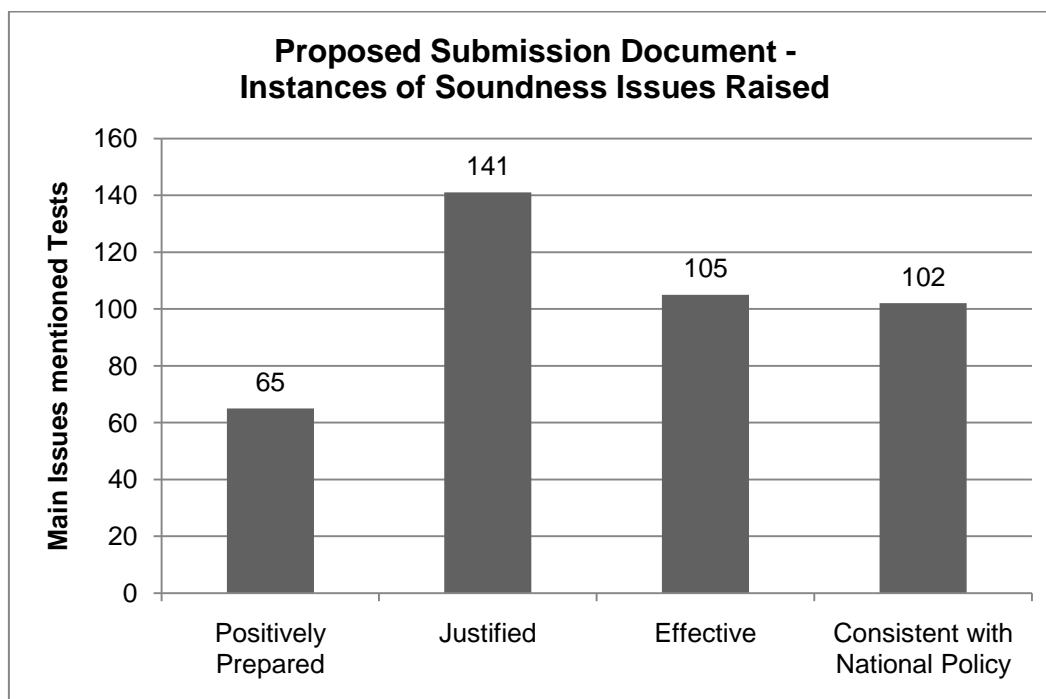
10.7 Some of the main issues raised mentioned both legal requirements and soundness issues while others did not raise either of these.

Figure 7: Proposed Submission Document: Instances of Tests Mentioned in Submissions



- 10.8 Figure 8 analyses the main issues raised according to the individual tests of soundness set in the National Planning Policy Framework. Of the instances where soundness matters were raised:
- 65 related to whether the plan is positively prepared;
 - 141 related to whether the plan is justified;
 - 105 related to whether the plan is effective; and
 - 102 related to whether the plan is compliant with national policy

Figure 8: Proposed Submission Document: Instances of Soundness Issues Raised



- 10.9 Some of the submissions mentioned more than one soundness test. This explains why the figures show there being more instances of tests being mentioned than indicated by Figure 8.
- 10.10 The analysis of the main issues also showed an uneven distribution of issues raised between policy areas. Figure 9 illustrates this breakdown and shows that Policy CS5 prompted by far the greatest number of responses, with 129 of the 323 main issues raised focusing on this policy area. This illustrates the controversial nature of the policy which aims to reserve Green Belt land for future development. Other related policies, including Policy CS1 (which summarises the spatial strategy for Knowsley) and Policy CS3 (relating to housing growth) also prompted more responses than most other policies. Figure 9 also shows that there were 53 instances within which main issues raised did not focus on a specific policy area, but instead related to more general matters.
- 10.11 Further analysis set out which parts of the Knowsley Core Strategy in general received the most attention through submitted responses. Each of the main issues raised has been attributed a chapter and/or general area of the Core Strategy. Figure 10 shows that the spatial strategy (Policies CS1 – CS8) prompted the most responses. In addition, there were a number of general issues raised, with additional general issues raised in relation to the preparation and consultation processes undertaken.

Figure 9: Proposed Submission Document: Instances of Policies Mentioned

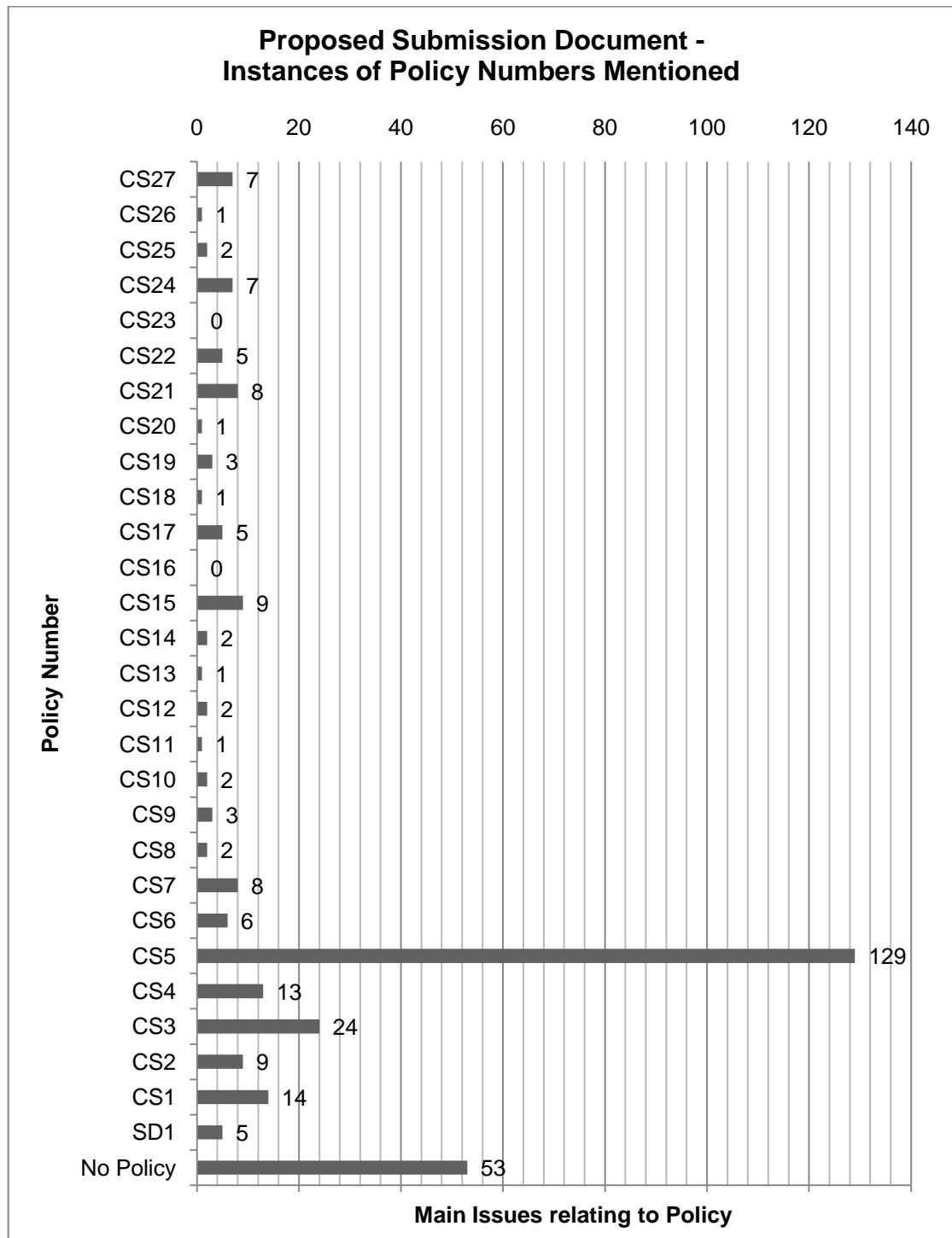
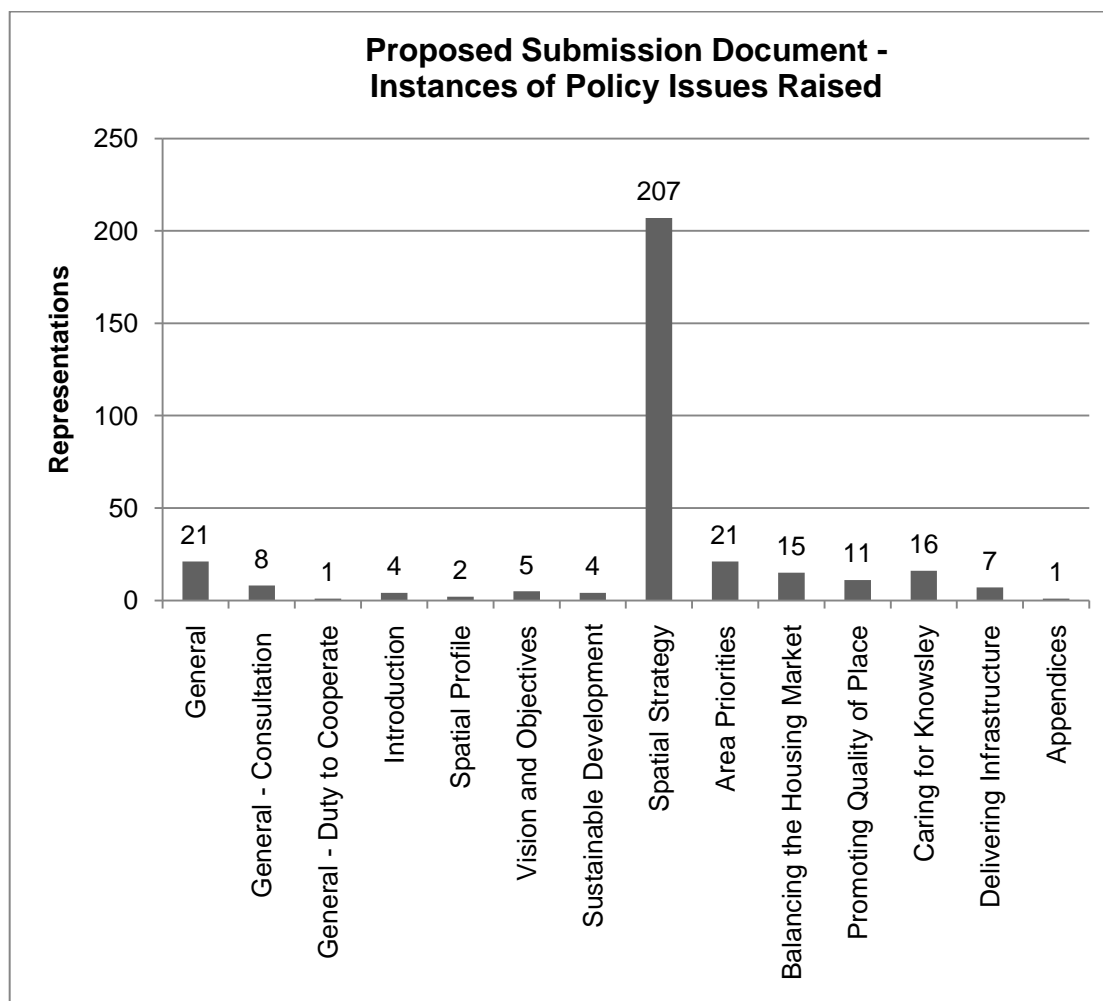


Figure 10: Proposed Submission Document: Instances of Policy Issues Raised in Representations



11. Summary of Representations Received

11.1 Appendix 4 contains the proformas from the analysis of submissions, showing the main issues raised by each. The representations have been arranged in plan order, and include:

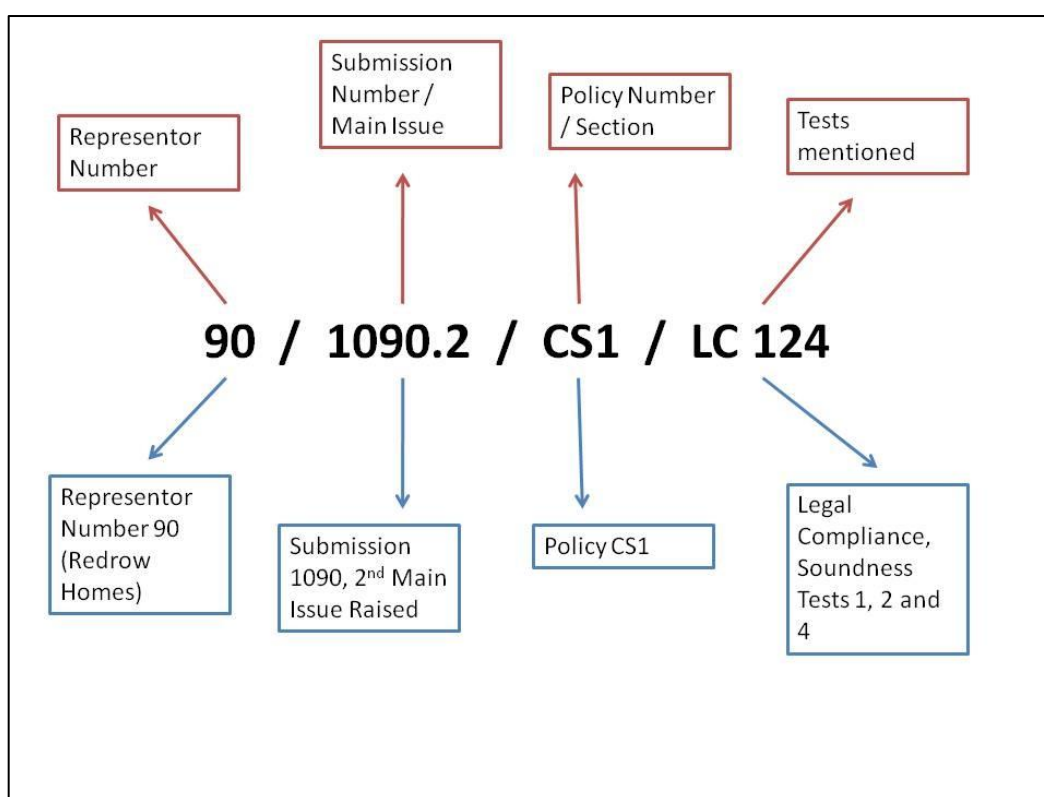
- Labeling of representation, representor and original submission
- Reference to the policy and/or paragraph number upon which the representation is based
- Statement of whether the representation relates to issues of legal compliance or soundness, and which soundness tests apply if appropriate
- Cross referencing to other representations made as part of the same submission, including links to original documents submitted (and set out in the Report of Representations)
- Summary of the main issues raised by the submission (between 1 and 16 main issues per submission)
- Summary of the changes to the Plan requested by the representation

- Indication of whether or not the representor wishes to attend the Examination hearings, and the reason for this.

11.2 Within Appendix 4, the Council has introduced a coding sequence. This is explained as follows, with a worked example given in Figure 11.

- First number: representor number (1 – 127)
- Second number: submission number (1001 – 1120) and number of main issue raised (.1 - .16 in the maximum case)
- Third number: issue raised (policy number or general issue)
- Fourth number: indication of which tests mentioned (LC – legal compliance, soundness tests 1-4, i.e. positively prepared, justified, effective, consistent with national policy)

Figure 11: Worked example of coding of main issues raised



Appendix 1 – List of Bodies Invited to Make Representations (as at November 2012)

North West Regional Assembly
North West Regional Development Agency
Neighbouring Authorities:
Liverpool City Council
Sefton Metropolitan Borough Council
Halton Borough Council
St Helens Metropolitan Borough Council
Wirral Metropolitan Borough Council
West Lancashire Borough Council
Lancashire County Council
Cheshire West and Chester Council
Natural England
The Environment Agency
English Heritage
Highways Agency
Merseytravel
Network Rail
NHS Merseyside
Knowsley Public Health
Knowsley Clinical Commissioning Group (CCG)
United Utilities (Water supply/Waste water)
National Grid (Gas/Electricity)
Scottish Power (Electricity)
N-Power Renewables
Virgin Media
MONO
British Telecom
Town and Parish Councils:
Whiston Town Council
Prescot Town Council
Halewood Town Council
Knowsley Parish Council
Cronton Parish Council
Tarbock Parish Council
Simonswood Parish Council
Aintree Village Parish Council
Melling Parish Council
Rainhill Parish Council

Appendix 2 – The Consultation Database (as at November 2012)**Organisations (alphabetical order)**

1st 4 Kirkby	Cass Associates
4NW	CB Richard Ellis Ltd
ACEVO	CBI
Acorn Farm	CBI Centre Point
Age Concern Knowsley	CDP Ltd
Ainscough Strategic Land Ref:	CEN KOPV
Auckland Park Interests	Centre for Ecology and Hydrology
Aintree Village Parish Council	Cheshire West and Chester
Amalcroft Properties	Borough Council
Ambulance Service	Church Commissioners for
AMEC E&I UK	England
Arena Housing Association	Civic Trust for the North West
Arriva Merseyside	Civil Aviation Authority
Baker Associates	Colliers CRE
Bakers Green	Colliers International
Barbour ABI	Community Empowerment
Barratt Homes	Network
Barton Willmore	Confederation of Passenger
BASC Northern Centre	Transport
Bellway Homes	Connexions
Bidwells Carpenter Planning	Council for Voluntary Service
Bloor Homes North West	Country Land and Business
Bluebell	Association (CLA)
Bluebell Estate	Countryside Properties Ltd
BNP Paribas Real Estate	Court Hey Residents Association
Bold Manor Community Group	CPM (UK) Ltd
Bowring Park Residents	CPRE Lancashire Branch
Association	Cronton Parish Council
British Aggregates Association	Cross Lane Residents
British Energy	Cycling Projects
British Geological Survey	David Wilson Homes North West
British Telecom	Defence Estates
British Waterways North West &	Delph Residents Action Group
Wales	Department for Business
Brook & Cook Street Residents	Innovation and Skills
Brook Residents	Department for Environment, Food
Brookhouse Group	& Rural Affairs
Brookhouse/Bakers Green	Department for Transport
Building Research Establishment	Department for Work and Pensions
Byways and Bridleways Trust	Department of Constitutional
C.E.N & Neighbourhood Watch	Affairs
CA Planning	Department of Culture, Media and
CABE	Sport
Caldecotte Consultants	Department of Health
Campaign for Real Ale (CAMRA)	Design Council Cabe

Development Planning Partnership
Development Securities PLC
Domestic Electrics Merseyside
DPP
Drivers Jonas
Drivers Jonas Deloitte
Eccleston Parish Council
Edmund Kirby
Elan Homes
Eli Lilly and Company Ltd
Emery Planning Partnership
English Heritage - NW
Envirolink Northwest
Environment Agency
Environmental Compliance Limited
EPP
Equality and Human Rights Commission
Everton FC
Field Lane Neighbourhood Network
Fields in Trust
Fisher German
FLP
Forestry Commission - NW
Forster and Company
Freight Transport Association
Frost Planning Limited
Fusion Online Limited
Gerald Eve
GONW
Greenbrook Construction Ltd
Greenwood Residents
Grosvenor Liverpool Fund
Groundwork Merseyside
GVA
GVA Grimley
Hale Parish Council
Halewood Amenities Committee
Halewood Community Network
Halewood Community News
Halewood Health Forum
Halewood International Limited
Halewood Pathways
Halewood Town Council
Halewood Village/Tarbock Area Ca
Halewood Youth In Community
Halton Borough Council

Hazelmere Residents Association
Health and Safety Executive
Health In Halewood
Healthlink
Help The Aged
High Hills Community Association
Highfields residents
HighPoint Residents Association
Highways Agency
Himor Group
Home Builders Federation
Homes and Communities Agency
HOW Planning Ltd
Howard Ward Residents
Huyton Community Trust
Huyton Manor Residents Group
Ibstock Group Ltd
ICCM
JASP Planning Consultancy Ltd
JMP Consulting
Job Centre Plus
Jones Lang LaSalle
Junction Property Limited
JWPC Ltd
KEMS
KHT
King Sturge LLP
Kings Gaming Centre
Kirkby Residents Action Group
Kirkby Team Ministry
Kirkwells Town Planning Consultants
Knowsley Age UK / Age Concern
Knowsley Borough Council
Knowsley Business Watch
Knowsley Chamber of Commerce
Knowsley Clinical Commissioning Group (CCG)
Knowsley Development Trust
Knowsley Enterprise Academy
Knowsley Friends of the Earth
Knowsley Housing Trust
Knowsley Liberal Democrat Group
Knowsley Liberal Democrats - Kirkby Branch
Knowsley Link
Knowsley MBC Multi Faith and Belief Group

Knowsley Local Plan: Core Strategy

Knowsley Older People's Voice
Knowsley Parish Council
Knowsley PCT
Knowsley Public Health Team
Knowsley Village Community Association
Knowsley Village Community Network
Lamb and Swift Commercial
Lancashire Association of Local Councils
Lancashire County Council
Landbanking Action Committee
LCR Local Enterprise Partnership
Leathers Lane/Wood Road Community Association
Littledale Residents Association
Liverpool 14 Community Action Group
Liverpool City Council
Liverpool Institute of Higher Education
Liverpool JMU
Liverpool John Lennon Airport
LMC Associates Ltd
Mackets Community Association
Maro Developments
Marshfield Community
Matthews and Goodman LLP
Mayor of London
Maypole Farm
McDyre & Co. Ltd
Melling Parish Council
Mersey Rail
Mersey Strategy
Merseyside Archaeological Advisory Service
Merseyside Environmental Advisory Service (MEAS)
Merseyside Fire and Rescue Service
Merseyside HAZ
Merseyside No.1 circuit of Jehovah's Witnesses
Merseyside Police (Huyton)
Merseyside Police HQ
Merseyside Policy Unit
Merseyside Waste Disposal Authority

Statement of Previous Consultation

Merseytravel
Mill Properties
Mineral Products Association
Mobile Operators Association (MOA)
Mono Consultants Ltd
Morris Homes (North) Ltd
Nathaniel Lichfield & Partners
National Farmers Union - NW
National Federation of Builders Limited
National Forest Company
National Grid - Electricity
National Grid - Gas
National Grid Company
National Market Traders Federation
Natural England
NDC
Network Rail
NewHeartlands
NHS Merseyside
NJL Consulting
North Huyton Neighbourhood Network
North Huyton New Deal - New Future
North West Chamber of Commerce
North West Regional Leaders Board
Northern Trust
Northern Venture
NorthWest Development Agency
Northwood Health Focus Group
Northwood Neighbourhood Network
Northwood Regeneration Partnership
npower renewables
NV Assets LLP
Ofcom Field Operations - England North
Office of Government Commerce
Office of Rail Regulation
Older peoples Voice
Open Spaces Society
Orbit Investments (Properties) Limited

Origin3 Ltd
PALS-KPCT
Passenger Focus
Patten Properties Limited
Peacock and Smith
Peel Holdings (Land and Property) Limited
Peel Investments North Ltd
Peel Ports
Persimmon Homes
Planning Aid
Planning Potential
Plot of Gold Ltd
Prescot and Whiston Neighbourhood Network
Prescot Business Park Limited
Prescot Town Council
Primary Fluid Power
Procter and Gamble
Public Health Team, NHS Knowsley
Quarry Products Association
RADRA
Rail Freight Group
Rainford Parish Council
Rainhill Civic Society
Rainhill Parish Council
Ramblers
Rapleys LLP
Reading Reform Foundation
Redrow
Redrow Homes
Remondis UK Limited
RenewableUK
Residents Association
Residents of Foxshaw Close, Windy Arbor Close and Simons Close
RHA Northern Region
Roby Neighbourhood Network/Huyton U3A
Roman Summer
Roman Summer Associates Ltd
Royal Mail Group
Royal Oak Residents association
RPS
RSPB Northern England Region
RSPCA

RSPCA - Halewood
Rupert Road Residents Association
Sanderson Weatherall
Savills
Savills (L&P) Ltd
Scottish Power Energy Networks
Seddon Associates
Sefton Metropolitan Borough Council
Simonswood Parish Council
Skills Funding Agency
South Avenue Residents
Southdene Community Association
Southdene Neighbourhood Network
Spawforths Associates
Spencer Industrial Estates Limited
Spenhill Regeneration Limited
Sport England - NW Region
St Chad's Church / Centre 63 Ltd
St Gabriels Neighbourhood Network
St Gabriel's Residents
St Helens Metropolitan Borough Council
St John's Residents
St. Andrew's Church
Steven Abbott Associates LLP
Stewart Ross Associates
Stockbridge
Stockbridge Village
Stronston Ltd
Strutt & Parker LLP
Sustrans
Swanside City Association
Swanside Community Association
Swanside Road
Tarbock Parish Council
Taylor Wimpey UK Limited
Taylor Young
The Coal Authority
The Co-Operative Group - Planning
The Crown Estate
The Disabled Persons Transport Advisory Committee
The Emerson Group
The Home Office

The Housing Corporation
The Land Trust
The Mersey Forest
The Mersey Partnership
The National Federation of Gypsy Liaison Groups
The National Trust
The Planning Bureau
The Planning Inspectorate
The Planning Studio Ltd
The Ramblers Association
The Showmen's Guild of Great Britain
The Stanley Estate and Stud Co
The Theatres Trust
The Wildlife Habitat Trust
The Wildlife Trust Lancs, Manc.and North M'side
The Woodland Trust
Torrington Drive Community Association
Tower Hill Neighbourhood Network
Tower Hill Residents Association
Transport for London
Traveller Law Reform Project
TravelWise
Tribal MJP
Turley Associates
Unite the Union

United Utilities Property Services Ltd
United Utilities Water plc
Valley Community Association
Victoria Road HA
Villages Housing Association
Virgin Media
Wainhomes Development Ltd
Warrington Borough Council
West Lancashire Borough Council
Weston House
Westvale Neighbourhood Network
Whiston Pathways
Whiston Town Council
Whitelodge Residents
Wigan Metropolitan Borough Council
WIKED
Wilson Commercial Consulting Ltd
Windle Beech Winthrop Ltd
Windle Parish Council
Wirral Metropolitan Borough Council
Women for Kirkby's Future
WYG Planning & Design
Youatt Avenue Residents Association
Youth Forum

General Public (alphabetical order)

(* additional communications were also sent at Proposed Submission stage to all households containing signatories of petitions submitted at the Preferred Options stage).

Mr Paul Allen	Mr Robin Greenway
Robert Arnall	Mr Daniel Greylish
Ms Angela Atkinson	Mrs Norma Griffiths
Mr P. R Bate	Mr Scot Halliday
Edward Bean	Mr Gerard Halliday
Mrs Lisa Bending	C Harmer
John Benn	Mr Harrison
Ms J Bennett	Mr and Mrs W. S. Harrison
Sheila Berry	Mrs Nora Haynes
Mr Tom Betts	David Holmes
Mr Samuel Birch	Mr Peter Horsfall
Mr David Bond	Colin Irlam
Mr Thomas Boyle	Ms Sandra Jaycock
Mr Nick Brearley	Mr Adrian Jones
Mr Cornelius Brooks	Mr David Kent
Mr Jason Brown	Laura Kettle
Mr Jonathan Burns	Mr Thomas Kirkwood
Amy Byrne	Mr John Lawday
Moya Clarke	Mrs Lawday
Carol Clarke	Mr Tom Leonard
Mr Stan Cleary	Mr Tom Leonard
Cllr Eddie Connor	Mr Richard Mainwaring
Ms Emma Cordingley	S M McCarthy
Mr Charles Alfred Daly	Miss R McGowan
Mr Jermaine Daniels	Nicola Meredith
Peter Davis	Mrs P M Meredith
Mrs I G Davis	Mr Billy Middleton
Mr Charles Decker	Mr Graham Moorcroft
Ms Gemma Dixon	Debby Murphy
Mr V Donnelly	Mrs Anna Murray
Mrs Joyce Duckworth	Mr Clive Narrainen
Kenneth Dunn	Mr Barry Nelson
S Edwards	Mr George Newby
Mr A G Edwards	Mr Kieron O'Neill
Mr Terry Fielding	Mr & Mrs Malcolm Elizabeth Owen
J Fitzgerald	Yvonne Owens
Mrs Joan Fitzsimmons	Mrs Carol Peers
Miss H M Flute	Mr Tom Phillips
Miss Ruth Ford	Mr Joe Price
Mr David Forster	Ms Viv Reading
Ms Leanne Foster	Mr and Mrs Rees
Chris Greenway	Mrs Marie Reeve

Dr Allan Richardson
Vicki Richardson
Mr James Robinson
Mr Carl Rowe
Mr George Rowlands
Matthew Rudder
Mr George Russell
Mr Nick Sandford
Mr Graeme Schlueter
Mr L Seagraves
Mr R Smith
Dave Smithson
Ms Lindsey Stephens
Mr John Steven
Mr Sebastian Tibenham
Mr Mike Townson
Mr Wayne Tully
Mr David Wardale
Mr Robert Watkin
Mrs Gladys Webster
Mr John Webster
Kathleen Whitfield
Cllr D Williams
Mr J Williams
Mr Robert Williams
Mr John Woollam
Mrs Marie Youds

Appendix 3 – Statement of Representations Procedure (Proposed Submission)

Knowsley Local Plan: Core Strategy Publication of “Proposed Submission” Document

Statement of Representations Procedure

Introduction

1. Knowsley Metropolitan Borough Council (“the Council”) is preparing the **Knowsley Local Plan: Core Strategy**. The version of the document which the Council intend to submit to the Secretary of State is being made available for representations from **9am on Thursday 8 November 2012** until **12 noon on Friday 21 December 2012**. A Sustainability Appraisal (SA) report and other supporting documents will also be available between these dates to inform representations.

Statutory background

2. The Knowsley Local Plan: Core Strategy is being prepared in accordance with the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012. It will be a “development plan document” under the terms of that legislation. Regulations 17, 18, 19 and 22 are particularly relevant to this Statement.

Subject matter and area covered

3. The **Knowsley Local Plan: Core Strategy** sets out the strategic framework for sustainable development in the Borough of Knowsley up to 2028. It includes a vision, objectives and policies which will guide how and when new development will take place in the Borough.
4. The Core Strategy will provide the strategic context for other planning policy documents including other parts of the Local Plan. The Core Strategy identifies the broad scale and locations of new development. Detailed site allocations for specific forms of development will be set out in other Local Plan documents.

Period within which representations must be made

5. Any person making representations about the Knowsley Local Plan: Core Strategy must do so in writing. Representations must be received by the Council no later than **12 noon on Friday 21 December 2012**.

Submission of the Local Plan: Core Strategy and representations to the Secretary of State

6. After the end of the publication period referred to above, the Council proposes to submit the Knowsley Local Plan: Core Strategy to the Secretary of State with other supporting documents as required by Regulation 22. This will include all representations which are validly made within the publication period.

Format of Representations

7. Under Section 20 (5) of the Planning and Compulsory Purchase Act 2004 the Secretary of State can only consider representations which relate to whether the Local Plan: Core Strategy:
- Complies with legal requirements set out in the Act; and
 - Meets “soundness” tests in the National Planning Policy Framework¹¹.
8. To help ensure you submit your representations in the correct format, the Council will make available guidance notes, and facilities to submit representations, including response forms and an online consultation portal. You are advised to read the notes and use these facilities to submit any representations.

Statement of document availability

9. The Proposed Submission version of the Local Plan: Core Strategy, supporting documents, representation forms and guidance notes will be available to view, download and comment on from 9am on Monday 8 November 2012 at: <http://www.knowsley.gov.uk/LocalPlan>. The consultation portal is also available via the website.
10. Printed copies of the documents will also be available to view at the following places and times:

Locations	Opening times
Council offices at: Halewood One Stop Shop, The Halewood Centre, Roseheath Drive, Halewood, Knowsley, L26 9UH Huyton One Stop Shop, Archway Road, Huyton, Knowsley, L36 9YU Kirkby One Stop Shop, Cherryfield Drive, Knowsley, L32 1TX Prescott One Stop Shop, Prescott Shopping Centre, Aspinall Street, Prescott, Knowsley, L34 5GA	Between 9.00 am until 5.00 pm (excluding weekends and bank holidays)

¹¹ Available from:

<http://www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf>

Libraries at Huyton, Halewood, Kirkby, Page Moss, Prescot, Whiston and Stockbridge Village	The opening hours for each library vary and details of these and the address of each library are available to view on the Council website at: www.knowsley.gov.uk/residents/libraries .
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11. Printed representation forms (including guidance notes) will be available on request at all locations, or through the contact details below.

How to submit representations

12. Representations should be submitted by 12.00 noon on Friday 21 December 2012, using the following methods:
- Online at: <http://consult.knowsley.gov.uk>;
 - Email to: LocalPlan@knowsley.gov.uk; or
 - Post to: Local Plan Team, Knowsley MBC, 1st Floor Annexe, Municipal Buildings, Archway Road, Liverpool L36 9YU.
13. All representations should specify the matters to which they relate and the grounds on which they are made. Only those representations that are made in writing (either electronically or on paper) and arrive at the address specified within the consultation period, closing at 12.00 noon on Friday 21 December 2012 will be considered during the subsequent stages.
14. It is strongly recommended that you use the consultation portal or Representation Forms provided by the Council to make your representation to ensure that it relates to the issues of legal compliance or soundness.
15. Comments received during previous consultations will not be carried forward.

Request for further notifications

16. Representations may also be accompanied by a request to be notified at a specific postal or e-mail address of any of the following:
- That the Local Plan: Core Strategy has been submitted for independent examination;
 - The publication of the recommendations of any person appointed to carry out an independent examination of the Plan; or
 - The adoption of the Local Plan: Core Strategy.

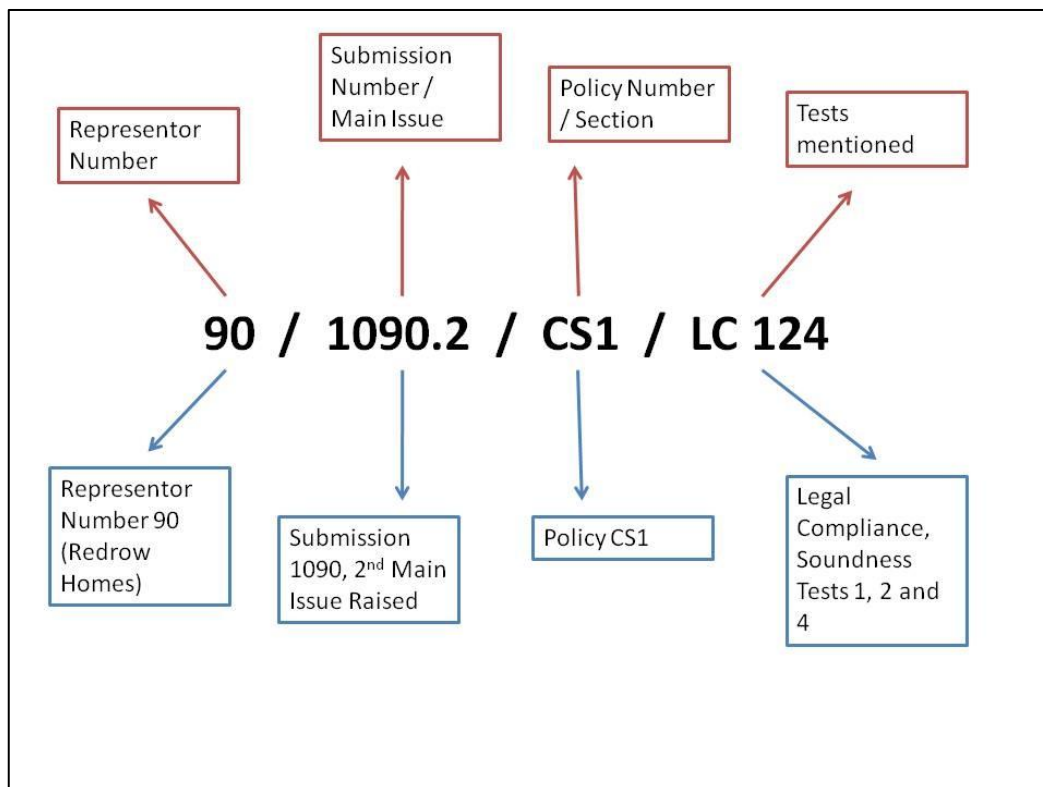
Further information

17. Further information, or advice, can be obtained by phoning 0151 443 2326 or by emailing LocalPlan@knowsley.gov.uk.

Appendix 4: Summary of issues raised in Regulation 20 consultation responses

The responses received have been individually coded and each representation provided a unique reference number. The coding sequence is explained as follows, with a worked example given in the diagram below.

- First number: representor number (1 – 127)
- Second number: submission number (1001 – 1120) and number of main issue raised (.1 - .16 in the maximum case)
- Third number: issue raised (policy number or general issue)
- Fourth number: indication of which tests mentioned (LC – legal compliance, soundness tests 1-4, i.e. positively prepared, justified, effective, consistent with national policy)



Plan Order report

21/1021.2/ GEN

Mr Peter Monaghan

Plan
Order.ID

General - Consultation

Objection

WR - Written Representation

1

Summary of Main Issues Question why Council officers have not been knocking on doors, posting letters, asking questions or giving information about the proposed reservation of land at South Whiston for new residential development.

Summary of Suggested Changes n/a

Council Response: The Council has complied with its Statement of Community Involvement (PP15) at all previous stages of consultation on the Core Strategy and hence its approach has been legally compliant.

General - Consultation

Objection

AE - Attending Examination

1

**Summary of
Main Issues**

- Not legally compliant due to a failure to consult effectively and comply with the SCI, including on evidence base
- Not legally compliant as the findings of Preferred Options stage (Whiston petition) were not accounted for
- Justification of the strategy is weakened due to flaws in the consultation process and lack of local community participation at an early stage

**Summary of
Suggested
Changes**

- Consultation should be re-started and all consultation processes repeated
- The Council should take particular care to ensure residents on the edge of Cronton Colliery (Location 9)

**Council
Response:**

The Council supports its approach to consultation on the Local Plan as legally compliant and resulting in no soundness issues. The broad ranging consultation and engagement exercise undertaken on the emerging Local Plan over a number of years as summarised in the Statement of Previous Consultation (Regulation 20), far surpasses our legal obligations in relation to this matter, including compliance with our SCI, and has aimed to ensure good awareness of the Plan across the whole Borough.

General

Support

WR - Written Representation

1

**Summary of
Main Issues**

Support for Duty to Cooperate statement.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Support welcomed.

12/1012.1/ GEN

Ms Deborah McLaughlin

Homes and Communities Agency

Plan
Order.ID

General

Support

WR - Written Representation

1

**Summary of
Main Issues**

- General support for the principles and policies contained in the Core Strategy.
- Support for the Council's ambitions for a focused regeneration programme, supported by a clear objective to encourage economic and housing growth in a sustainable manner.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Comments welcomed

13/1013.1/ GEN / LC

Mr Jermaine Daniels

Merseyside Environmental Advisory Service

Plan
Order.ID

General

Support

WR - Written Representation

1

**Summary of
Main Issues**

- Support for the process of plan preparation, welcome that the Council has adequately taken into account comments from previous stages.
- General support for the Core Strategy which is comprehensive and well presented
- The Vision, Objectives, Spatial and Thematic policies are supported and have been developed from a robust evidence base
- Support for clear policy links and adequate coverage of relevant issues
- Support for the commitment made to protecting and enhancing biodiversity in accordance with national legislation and policy

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Supportive comments welcomed.

113/1113.1/ GEN

Mr David Hopkin

United Utilities Plc

Plan
Order.ID

General

Support

WR - Written Representation

1

**Summary of
Main Issues**

- United Utilities would like to build a strong partnership with Local Planning Authorities to aid sustainable development and growth within the North West.
- Further to recent requests for details on specific development sites, it would be beneficial to hold further discussions with the Council to explore development options in more detail in advance of any future planning application submissions.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council notes United Utilities comments and welcomes opportunities for partnership working in supporting sustainable development and growth within Knowsley and its neighbouring authorities. Information and clarification on strategic sites have been provided to United Utilities in response to the receipt of the request within the representation, and engagement will be ongoing as the Local Plan progresses towards the Site Allocations and Development Policies stage.

14/1014.1/ GEN

Jackie Copley

Lancashire Branch of the CPRE

Plan
Order.ID

General

Support with Amends

WR - Written Representation

1

**Summary of
Main Issues**

- Priorities regarding sustainable neighbourhoods, positive lifestyle choices and rural landscapes should be more strongly reflected in Core Strategy.
- Protection of rural areas is important to the functioning of the Liverpool City Region. Environmental protection should be in balance with economic and social progress.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider that no soundness or legal compliance issues raised. The Council has recognised the protection and enhancement of rural landscapes as a priority within Policy CS2.

14/1014.2/ GEN / LC

Jackie Copley

Lancashire Branch of the CPRE

Plan
Order.ID

General

Support

WR - Written Representation

1

**Summary of
Main Issues**

- Noted that the Sustainability Appraisal incorporates Strategic Environmental Assessment in accordance with European Union Directives.
- Noted that the Habitats Regulation Assessment Notes that Knowsley does not contain any European sites but there are some in neighbouring district areas.
- Noted that transport issues are dealt with within the Merseyside Local Transport Plan.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Noted.

110/1110.1/ GEN

Mr Michael Devers

Plan
Order.ID

General - consultation

Objection

WR - Written Representation

1

**Summary of
Main Issues**

- Authority has not duly advised or sought guidance from local community
- Address in Green Belt has not received relevant material

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council supports its approach to consultation on the Local Plan as legally compliant and resulting in no soundness issues. The broad ranging consultation and engagement exercise undertaken on the emerging Local Plan over a number of years as summarised in the Statement of Previous Consultation (Regulation 20), far surpasses our legal obligations in relation to this matter, including compliance with our SCI, and has aimed to ensure good awareness of the Plan across the whole Borough.

11/1011.1/ GEN / LC

Ms Kate Wheeler

Natural England - Land Use Operations

Plan
Order.ID

General

Support

WR - Written Representation

1

Summary of Main Issues Support for Core Strategy, considered to be sound and legally compliant.

Summary of Suggested Changes n/a

Council Response: Comments welcomed.

21/1021.1/ GEN

Mr Peter Monaghan

Plan
Order.ID

General - Consultation

Objection

WR - Written Representation

1

Summary of Main Issues Concern about the role of Whiston Town Council in the preparation of the Core Strategy.

Summary of Suggested Changes n/a

Council Response: Whiston Town Council has been consulted at every stage of consultation on the Core Strategy, as documented in the Statement of Previous Consultation and related supporting documents.

111/1111.2/ GEN / S 1 3 4

Mr Orry King

Plan
Order.ID

General - Consultation

Objection

AE - Attending Examination

1

Summary of Main Issues - Local residents affected by the proposals that involve reclassifying green belt areas were not consulted.
- No steps taken to resolve consultation issues at previous stages despite awareness having been raised.

Summary of Suggested Changes - Consultation should be allowed to enable those affected to state their cause / argument.

Council Response: The Council supports its approach to consultation on the Local Plan as legally compliant and resulting in no soundness issues. The broad ranging consultation and engagement exercise undertaken on the emerging Local Plan over a number of years as summarised in the Statement of Previous Consultation (Regulation 20), far surpasses our legal obligations in relation to this matter, including compliance with our SCI, and has aimed to ensure good awareness of the Plan across the whole Borough.

67/1067.4/ GEN / LC

Mr Marcus Hudson

Lancashire County Council

Plan
Order.ID

General

Support

WR - Written Representation

1

Summary of Main Issues No objections to the Core Strategy.

Summary of Suggested Changes n/a

Council Response: Noted and welcomed.

**Summary of
Main Issues**

- The Government might look into this final consultation for four new policies that began 8/11/12 and end in the final days of Christmas week
- There is a long history of KMBC disregarding the views of local residents
- We saw an absence of local Councillors prior to and during the major retail planning inquiry in 2009

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council supports its approach to consultation on the Local Plan as legally compliant and resulting in no soundness issues. The broad ranging consultation and engagement exercise undertaken on the emerging Local Plan over a number of years as summarised in the Statement of Previous Consultation (Regulation 20), far surpasses our legal obligations in relation to this matter, including compliance with our SCI, and has aimed to ensure good awareness of the Plan across the whole Borough.

74/1074.1/ GEN / LC

Miss Laila Smith

Environment Agency

Plan
Order.ID

General

Objection

WR - Written Representation

1

**Summary of
Main Issues**

- The Local Plan has not made sufficient reference to the Water Framework Directive, which requires all surface water bodies to achieve good ecological status or good ecological potential by 2027.
- Waterbodies in Knowsley currently fail the requirements of the Directive and are of poor quality.
- The Sustainability Appraisal identifies that the biological and chemical status of rivers needed to be improved. The Core Strategy does not make sufficient reference to preserving or enhancing water bodies.

**Summary of
Suggested
Changes**

More specific references to the Water Framework Directive and protecting and enhancing the environment should be made. This could include policies for improving water, protecting groundwater sources, river restoration and enhancements including deculverting.

**Council
Response:**

No soundness or legal compliance issues given the Council has included references to minimising impact upon water quality (Policy CS2) and includes a general approach to Green Infrastructure (Policy CS8) that seeks to protect and enhance the environment, including mitigating water pollution (1e). There is also clarification of support for management plans relating to locally important watercourses at Para. 5.98 and a minor change is proposed at submission stage to paragraph 5.91 to also cover this point.

75/1075.1/ GEN / LC

Ms Hannah Whitfield

Wirral Metropolitan Borough Council

Plan
Order.ID

General

Support

WR - Written Representation

1

**Summary of
Main Issues**

The Plan will not have any significant negative impacts on Wirral.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Noted.

General

Support

WR - Written Representation

1

**Summary of
Main Issues** No comments.

**Summary of
Suggested
Changes** n/a

**Council
Response:** Consider no soundness or legal compliance issues raised.

General

Objection

AE - Attending Examination

1

**Summary of
Main Issues**

- In contrast to very many local planning authorities, a great deal of evidence work has been undertaken for the Core Strategy.
- However the plan has reached submission stage without really changing the plan in relation to matters we have raised at the earlier stages of the plan's preparation, this suggests that the consultation has had little influence and the plan making process which requires the testing and justified selection of options has not been followed fully.
- In addition, the NPPF which was in Draft at the previous stage, has significantly advanced the requirements from a Core Strategy, but there is no sign that this has had any real influence on the Submission document.
- Evidence on which the plan is based is incomplete.
- No indication of how cross boundary strategic issues have helped determine the matters to be addressed in the plan.
- The most basic requirement of the plan - that there is a compelling link between the evidence and what the plan says - is not demonstrated.

**Summary of
Suggested
Changes**

- The most appropriate strategy for the plan would be one which (amongst other things);
- identifies, acknowledges and seeks to meet a higher housing requirement.
 - provides for a greater level of housing to take place in Halewood with the identification of the representation land in Lydiate Lane for development in the plan, with the necessary change to the Green Belt.
 - Identifies land currently in the Green Belt that should become 'safeguarded land', as required by the Framework.

**Council
Response:**

The Council supports its policies and approaches to plan preparation as sound and legally compliant, with evidence of how the consultation stages have influenced the plan and how the Council has considered consultation representations at previous stages included in the Statement of Previous Consultation.

83/1083.1/ GEN / LC

Mr Stephen Heverin

First Ark

Plan
Order.ID

General

Support

WR - Written Representation

1

Summary of Main Issues No comments made.

Summary of Suggested Changes n/a

Council Response: Noted.

89/1089.4/ GEN / S 1 2 3

Mr John Fleming

Kirkby Residents Action Group

Plan
Order.ID

General - Consultation

Objection

AE - Attending Examination

1

Summary of Main Issues

- The Council have failed to properly engage with members of Krag and Krag has been unable to illicit answers to the many questions put to staff during this consultation, nor did Krag (as stakeholders) receive updates on the changing deadlines
- The Council's main approach to consultation appeared to emphasise presentation rather than clarity on their proposals
- Krag has little confidence views will be acted upon and therefore if there is any dispute with our suggestions, these should be considered by the Inspector

Summary of Suggested Changes n/a

Council Response: The Council supports its approach to consultation on the Local Plan as legally compliant and resulting in no soundness issues. The broad ranging consultation and engagement exercise undertaken on the emerging Local Plan over a number of years as summarised in the Statement of Previous Consultation (Regulation 20), far surpasses our legal obligations in relation to this matter, including compliance with our SCI, and has aimed to ensure good awareness of the Plan across the whole Borough.

101/1101.6/ GEN / LC

Mrs Josephine Bennett

Plan
Order.ID

General

Objection

WR - Written Representation

1

Summary of Main Issues - Overpopulation causes diseases
- Where will food be grown or come from?

Summary of Suggested Changes n/a

Council Response: The Council supports its policy approach as sound and legally compliant, and therefore does not consider that the Local Plan would result in over population. The strategic approach of Policy CS8 provides sufficient protection for food production through preservation of landscape function and allotments, with UDP Policy G3 relating to Agricultural Land saved until replacement through the Local Plan: Site Allocations and Development Policies

17/1017.1/ GEN

Mr Edward Bean

Plan
Order.ID

General

Support

WR - Written Representation

1

Summary of Main Issues Support for the majority of policies within the Core Strategy.

Summary of Suggested Changes n/a

Council Response: Welcomed.

General

Objection

AE - Attending Examination

1

**Summary of
Main Issues**

- Important functional relationships between Knowsley, St. Helens and Liverpool in particular must be acknowledged. There is no explicit recognition of this requirement in the strategy, nor anything of substance in the plan which has arisen from cooperation with other local planning authorities.

- The Council's way of discharging its duty to cooperate seems to be to rely on the Liverpool City Overview Study. Relevant authorities maintaining the Regional Spatial Strategy housing requirements does not feel like an evidence driven approach and is not what the duty to cooperate has been included in legislation and national policy to achieve.

**Summary of
Suggested
Changes****Council
Response:**

The Council supports its policy approach and approach to plan preparation as sound and legally compliant.

General

Support with Amends

WR - Written Representation

1

**Summary of
Main Issues**

Local plan policies may need to be reviewed in the light of statistics arising from the Census 2011.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The Council considers that its approach to monitoring of the Plan and revisions to evidence will allow the Plan to account for newly available statistics. The results of the 2011 Census which are available at the time of submission have been addressed where necessary in minor changes to the Plan and in changes to its supporting Technical Reports.

5/1005.1/ GEN / S 4

Paul Slater

Plan
Order.ID

General

Objection

AE - Attending Examination

1

**Summary of
Main Issues**

- Certain data has been overlooked.
- Full cooperation has not been made with other authorities, particularly Liverpool City Council, to address cross border issues.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. Plan is supported by a full and robust evidence base and through evidenced cooperation with neighbouring authorities.

2/1002.1/ GEN / LC

Diane Clarke

Network Rail

Plan
Order.ID

General

Support

WR - Written Representation

1

**Summary of
Main Issues**

No comments.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised.

**Summary of
Main Issues**

The residents of Lydiate Lane, Gerrards Lane and North End Lane not being aware of the submitted plan.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council supports its approach to consultation on the Local Plan as legally compliant and resulting in no soundness issues. The broad ranging consultation and engagement exercise undertaken on the emerging Local Plan over a number of years as summarised in the Statement of Previous Consultation (Regulation 20), far surpasses our legal obligations in relation to this matter, including compliance with our SCI, and has aimed to ensure good awareness of the Plan across the whole Borough.

General

Objection

AE - Attending Examination

1

**Summary of
Main Issues**

- Access to documents in public deposit locations and difficulty caused by the inability to remove the document to allow consideration of the Map 6.3 associated to Para 6.45 and unavailability of a colour photocopier in deposit locations.
- Unsuitability of all maps in terms of scale, representation, accuracy, precision, proportion, absence of OS base and annotations relating to local roads, specific boundaries and sites of local reference which makes them misleading and reduces clarity / understanding.

**Summary of
Suggested
Changes**

- Need to name or make clear local, roads, boundaries and sites of local reference.
- All features on the maps must be correct.

**Council
Response:**

The Council supports its approach as legally compliant in terms of the requirements of a Local Plan: Core Strategy Key Diagram (and supplementary maps). The suggested changes reflect details associated to the Policies Map (currently known as the UDP Proposals Map) with detailed allocations intended to be amended accordingly as part of the preparation of the Local Plan: Site Allocations and Development Policies document. On this basis, the suggested changes to maps are not considered necessary or appropriate at this stage.

General - Duty to Cooperate

Objection

AE - Attending Examination

1

**Summary of
Main Issues**

- Authority has a duty to co-operate and have not showed they have produced the Local Plan in consultation with neighbouring authorities and investigated the availability of land locally.
- If there is not enough land in the Knowsley area, our neighbouring authorities such as St. Helens have readily available supply where development could be directed.

**Summary of
Suggested
Changes**

- Recommend withdrawal of proposal to build on farmland at Whiston which is designated as Green Belt to make it relevant to the economic climate and compliant with national policy.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant, with supplementary evidence and justification in the Duty to Cooperate Statement, together with the Technical Report: Green Belt (TR03), Technical Report: Planning for Housing Growth (TR01) and Technical Report: Planning for Employment Growth (TR02). As a consequence it is not considered that the suggested change is necessary or appropriate.

Introduction

Objection

WR - Written Representation

7

**Summary of
Main Issues**

- Question what is meant by vibrant community living and excellent community facilities.
- Kirkby needs leisure facilities and the Plan contains no scope for this
- The previous Kirkby stadium site would provide an ideal location for a large leisure park, which would bring jobs, revenue and improved transport links

**Summary of
Suggested
Changes**

The vacant Kirkby stadium site should be developed into a large leisure park with cinema, restaurants, etc.

**Council
Response:**

The Council has not considered the detailed development proposals for existing allocated sites including Kirkby Stadium and has collated evidence on leisure needs and feasibility of delivery through the Knowsley Town Centre and Shopping Study (EB12 & EB13) and Economic Viability Assessment (EB06). In this regard, sufficient flexibility is incorporated into the plan to allow for the delivery of leisure facilities in appropriate locations. However consider site specific approaches (such as Kirkby Stadium) best dealt with at a subsequent stage of plan preparation, and hence consider no soundness or legal compliance issues raised.

Introduction

Objection

AE - Attending Examination

11

**Summary of
Main Issues**

There is no justification for introducing a Community Infrastructure Levy, due to:

- a CIL charge must be based on an up-to-date adopted Local Plan and robust viability evidence
- a CIL charge must also be clearly linked to an Infrastructure Delivery Plan and an infrastructure funding gap must be demonstrated
- a CIL charge would need to be carefully and sensitively set in order to avoid harm to the deliverability of development
- past underperformance in housing delivery indicates that the deliverability of sites is under extreme pressure, which would be exacerbated by the premature introduction of CIL

**Summary of
Suggested
Changes**

Paragraph 1.9 should make clear that CIL would only be introduced post-adoption of the Local Plan and that the decision on whether to implement CIL will be taken on the basis of robust viability evidence and should be reviewed annually.

**Council
Response:**

The Council considers that the approach to CIL is compliant with regulations and statutory guidance. Policy CS27 maintains the requisite flexibility to introduce a CIL or other relevant approach to developer contributions, based on evidence.

Introduction

Objection

AE - Attending Examination

41

**Summary of
Main Issues**

Objection to lack of consultation with local residents.

**Summary of
Suggested
Changes**

Inform local residents on matters concerning any building in the Council boundaries.

**Council
Response:**

The Council's approach to consultation has been compliant with its Statement of Community Involvement (PP15).

Introduction

Objection

AE - Attending Examination

41

**Summary of
Main Issues**

Objection to the plan preparation process, including:

- the consultation deadlines have constantly changed, making it difficult to navigate the changing methods being used to assess supporting evidence
- the gestation period for producing four new policies runs to five years, 2007 - 2012
- the consultation being scheduled to finish before Christmas means many families are too busy to engage in the process
- there are too many appendices associated with evidence base, reducing transparency
- the Council's handling of the process does not inspire confidence they have considered evidence objectively.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council's approach to plan preparation has complied at all times with the relevant regulations and legal requirements. It has also complied with the Statement of Community Involvement (PP15).

Introduction

Objection

AE - Attending Examination

41

**Summary of
Main Issues**

- Para 1.37 states that the Council sought to involve everyone who has an interest in the future of Knowsley - a petition is enclosed (38 residents signatures, 28 individual addresses) as 100% proof that residents bordering or living in close proximity to KGBS17 (Cronton Colliery) were not informed and did not received any literature about Green Belt changes.
- In addition, residents in various different parts of Cronton Village have also told me they have not received any of the literature, with some having signed the petition.
- Enclose a copy of Cronton Neighbourhood Network meeting minutes (2nd February 2010) whereby the Council apologised that the delivery company had not fulfilled its aim to deliver to every household. The meeting occurred after the deadline for the Issues and Options consultation had passed.
- The Council then failed to notify residents as part of the Preferred Options consultation.
- The Council was unwilling to send out additional information in November 2012 when informed of local residents not having received literature.
- Local residents on the edge of Green Belt proposals remain unaware of the proposals, with any awareness occurring by chance.

**Summary of
Suggested
Changes**

- Make sure all literature and leaflets reach the households
- do an audit to check residents in various localities and settings of the Borough actually receive what delivery companies are paid for.
- Chase up delivery companies when they fail in their tasks.
- Visit town and parish councils to give presentations before deadlines.
- Visit all parish councils - I am not aware that Tarbock has received a presentation.
- Make sure Knowsley News goes to all homes.

**Council
Response:**

The Council supports its approach to consultation on the Local Plan as legally compliant and resulting in no soundness issues. The broad ranging consultation and engagement exercise undertaken on the emerging Local Plan over a number of years as summarised in the Statement of Previous Consultation (Regulation 20), far surpasses our legal obligations in relation to this matter, including compliance with our SCI, and has aimed to ensure good awareness of the Plan across the whole Borough. In the interest of clarity it should be noted that all Parish Councils were offered the opportunity of presentations at the consultation stages of Issues and Options, Preferred Options and Proposed Submission documents. In this regard, it is confirmed that Cronton Parish Council have received presentations during all three consultation stages, whereas no specific response or request was received from Tarbock Parish Council despite consultation at each stage and additional engagement sought through Area Partnership Boards.

5/1005.2/ KTP

Paul Slater

Plan
Order.ID

Knowsley – The Place

Objection

AE - Attending Examination

55

**Summary of
Main Issues**

- Figures in paragraphs 2.9 and 2.12 suggest that more households are projected than the increase in population.
- There is a difference between the population figures quoted in paragraph 2.9 and those in the Census 2011 statistics.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. These observations make no material difference to the Plan.

4/1004.3/ 2.26 KTP

Alex Naughton

Merseytravel

Plan
Order.ID

Knowsley - The Place

Support with Amends

WR - Written Representation

85

**Summary of
Main Issues**

- There should be support for the development of rail freight terminals at Knowsley Industrial Park in Kirkby and the Jaguar Land Rover Car Plant in Halewood.

**Summary of
Suggested
Changes**

- A reference to the Jaguar Land Rover freight terminal should be given in paragraph 2.26.

**Council
Response:**

Consider no soundness or legal compliance issues raised. Suggested change is minor in nature.

**Summary of
Main Issues**

Objection to Strategic Objectives 1, 2 and 3 due to the elements of them being inconsistent with other parts of the plan, principally consideration of Green Belt release. This is due to:

- Unsustainable impacts on building on high quality agricultural land, the loss of farmland wildlife, increased flood risk, increasing the need to travel, greater car dependency and usage;
- Urban edge effects making agricultural production less viable.

Support for Strategic Objective 4.

Support for Strategic Objective 5.

Support for Strategic Objective 6, in particular the encouragement of a reduction in the need to travel and prioritising sustainable development. However the release of Green Belt land is counter to this, as it would encourage further car dependency.

Support for Strategic Objective 7.

Support for Strategic Objective 8. The Council should support Green Belt policy and its aims and objectives.

Support for Strategic Objective 9.

**Summary of
Suggested
Changes**

Strategic Objectives 1, 2 and 3 could be supported if the proposal to remove land from the Green Belt was abandoned.

Within Strategic Objective 4, the element highlighting the potential residential offer in town centres should be promoted and encouraged.

In paragraph 3.9 (following Strategic Objective 7), land should be included as a resource to be used and managed in a sustainable manner.

**Council
Response:**

Consider no soundness or legal compliance issues raised. These observations are mainly around consistency of the Strategic Objectives with the remaining plan. The Council does not consider that any of the suggested changes are merited.

12/1012.2/ Spatial Vision

Ms Deborah McLaughlin

Homes and Communities Agency

Plan
Order.ID

Vision and Objectives

Support

WR - Written Representation

112

Summary of Main Issues Recognition and support for the spatial vision.**Summary of Suggested Changes** n/a**Council Response:** Comments welcomed.**17/1017.2/ Spatial Vision**

Mr Edward Bean

Plan
Order.ID

Vision and Objectives

Support

WR - Written Representation

112

Summary of Main Issues Support for the spatial vision and its recognition of the need to create a stronger and more diverse economy.**Summary of Suggested Changes** n/a**Council Response:** Welcomed.

17/1017.3/ Strategic Objectives

Mr Edward Bean

Plan
Order.ID

Vision and Objectives

Support

WR - Written Representation

113

**Summary of
Main Issues**

Support for Strategic Objective 1 which encourages sustainable economic and employment growth.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Welcomed.

113/1113.2/ 3.4 STR

Mr David Hopkin

United Utilities Plc

Plan
Order.ID

Vision and Objectives

Support with Amends

WR - Written Representation

116

**Summary of
Main Issues**

- Impact of new growth on infrastructure.
- Need to co-ordinate the delivery of development with the delivery of infrastructure improvements.

**Summary of
Suggested
Changes**

- It will be necessary to consider the impact of new growth on infrastructure.
- It may be necessary to co-ordinate the delivery of development with the delivery of infrastructure improvements.

**Council
Response:**

The Council notes the comments received in the representation and considers that this issue has already been subject to significant ongoing discussion with United Utilities as part of the preparation of the Infrastructure Delivery Plan and in meetings on an annual basis with resolution to the extent that there are considered to be no significant constraints to the delivery of development progressed through the Local Plan. Consequently the Council has requested confirmation of this position.

9/1009.1/ SD1

Matthew Robinson

HOW Planning

Plan
Order.ID

Sustainable Development

Support with Amends

WR - Written Representation

133

**Summary of
Main Issues**

- Support for Policy SD1, including the "presumption in favour of sustainable development" contained within the NPPF.
- Policies within the Core Strategy must be flexible enough to respond to economic changes including the supply and demand for housing and employment land.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised.

104/1104.1/ SD1 / S 2 3 4

Taylor Wimpey Homes UK Ltd & Redrow Homes Plc.

Plan
Order.ID

Sustainable Development

Support

AE - Attending Examination

133

**Summary of
Main Issues**

- Support the wording which translates the NPPF's "presumption in favour of sustainable development".

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council supports its policy approach as sound and legally compliant and therefore welcomes this comment.

**Summary of
Main Issues**

- Consider Policy SD1 is a robust and far-reaching policy which accords with NPPF principles
- Support policy wording and encourage that discussion between the Council and applicants, as well as the decision making process as a whole, be strongly guided by the principles

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council supports its policy approach as sound and legally compliant, and welcomes the comments.

Sustainable Development

Objection

AE - Attending Examination

133

**Summary of
Main Issues**

- Not a distinctive policy which addresses issues in the area, simply repetition of national policy that plans are not intended to do.
- Having set this policy down at the outset, essentially as a development management policy, what follows in the plan is not consistent with what the policy says.
- The plan does not match the requirements of the policy for clear policies that will guide the presumption to be applied locally - simply repeating the words of the policy is not enough.
- The plan is demonstrably deficient in terms of the failure to identify the objectively assessed need for housing, to seek opportunities to meet the development needs of the area or providing sufficient flexibility to adapt to rapid change.

See General Statement for further detailed comments.

**Summary of
Suggested
Changes**

- Policy SD1 needs to follow through the whole plan as a 'golden thread' suggested by the Framework, rather than other considerations coming to the fore. Subsequent parts of the plan are characterised by a resistance to the identification of sufficient development opportunities and the dominance of Green Belt as the determining factor in the scale and location of development opportunities. The plan should be driven by the statutory purpose and the Framework requirement of seeking more sustainable development.
- This is not something which can be dealt with by a change to Policy SD1, but the consequences of these comments are taken up in our representations on other policies and in the submitted General Statement.

See General Statement for further detailed comments.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant.

13/1013.2/ SD1

Mr Jermaine Daniels

Merseyside Environmental Advisory Service

Plan
Order.ID

Sustainable Development

Support

WR - Written Representation

133

**Summary of
Main Issues**

Policy SD1 is in general conformity with the Joint Merseyside and Halton Waste Local Plan.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Supportive comments welcomed.

Spatial Strategy

Objection

AE - Attending Examination

139

**Summary of
Main Issues**

Support for the principle of proposed identification of areas of review of Green Belt boundaries, specifically locations 2, 3 and 10.

Objection to the planned phased release of Green Belt land, including the safeguarding of location 10 for release after the plan period, due to:

- the Technical Report: Green Belt (TR03) identifies the development of land at Knowsley Village as having a positive impact on the delivery of Strategic Objectives
- the site has a significant identified residential capacity and would help to achieve aims of Policy CS1 in balancing the housing market, including the delivery of larger executive homes
- nearby employment opportunities, including Stanley Grange business village
- the site is available, deliverable and capacity of providing market and affordable dwellings in the short term

**Summary of
Suggested
Changes**

- Key diagram should be amended to show Green Belt broad location 10 as a reserved location for urban extension before 2028 (rather than safeguarded)

**Council
Response:**

The Council's approach to the development of land at Knowsley Village (Location 10) has been informed through the Council's evidence base, including the Green Belt Study (EB08) and Technical Report: Green Belt (TR03).

Spatial Strategy

Objection

AE - Attending Examination

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**Summary of
Main Issues**

- Support spatial strategy set out in first part of policy, especially the commitment to an early review of Green Belt boundaries with no alternative if the identified development needs are to be met.
- The sites proposed for release from the Green Belt will have to be developed relatively early in the plan period, reference to meeting 'longer term needs' is misleading.
- The Core Strategy should identify strategic allocations.
- Support the principle of designation of Principal Regeneration Areas, but consider the policy as drafted is overly permissive in stating that opportunities for development in Priority Regeneration Areas will be maximised without limit or proviso, such as the protection of important greenspaces or the wishes of the local community.
- Not positively prepared as it does not bring forward sufficient housing and employment development to meet objectively assessed needs, particularly in the first part of the plan period.
- Not properly justified by evidence and is not the most appropriate strategy.
- Not effective as it is not totally deliverable.

**Summary of
Suggested
Changes**

- Delete reference in Policy CS1 1 (e) to 'longer term needs'.
- Strategic allocations should be listed in Policy CS1 as a key part of the spatial strategy.
- Amend Policy CS1 3 to 'Opportunities for regeneration within the following Principal Regeneration Areas will be maximised'.
- Delete Policy CS1 (4) as it creates uncertainty.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), Technical Report: Planning for Housing Growth (TR01) and Technical Report: Planning for Employment Growth (TR02) relating to housing and employment requirements, as supported by evidence in the Green Belt Study (EB08), Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04), Joint Employment Land & Premises Study (EB07) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate, particularly noting that sufficient clarity on Principal Regeneration Areas is provided by Policies CS11 - CS14.

Summary of Main Issues - Wholly support the submissions of Redrow and Cass Associates on Policy CS1.

Summary of Suggested Changes n/a

Council Response: The Council supports its policy approach as sound and legally compliant.

Spatial Strategy

Objection

AE - Attending Examination

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**Summary of
Main Issues**

- the concept of re-balancing the housing stock by providing a wide choice of new market sector and affordable housing with supporting services is not explained in the supporting text of Policy CS1 or that of Policy CS3

- the SHMA identifies that turnover of existing housing stock will meet 90% of all housing needs, there is significant under occupation of housing stock (35%) and there is a greater proportion of affordable housing in the Borough than in neighbouring authorities, the north west or nationally - it would therefore be reasonable to properly explain within the document what is meant by the rebalancing the housing market concept and how aspirations for it varied across the Borough

**Summary of
Suggested
Changes**

- Explain through the Core Strategy what is meant by the rebalancing the housing market concept

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Planning for Housing Growth (TR01) relating to housing requirements, as supported by evidence in the Strategic Housing Market Assessment (EB04) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate, noting that Policy CS17 and Table 7.1 provides additional clarification in terms of types and sizes of houses required.

Spatial Strategy

Objection

AE - Attending Examination

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**Summary of
Main Issues**

- The policy is insufficiently spatial and does not set out a positive strategy for the individual areas of the Borough.
- It does not reflect the evidence that exists about the places and fails to reflect the roles of the different places, jobs and commuting patterns is setting out how areas should develop.
- Maintaining the existing settlement hierarchy, and distributing development according to capacity, does not provide a suitable strategy for development of the Borough and is not an effective approach for delivering the growth that is required.
- In addition the plan allows the Green Belt to determine the location of the development that will necessarily take place beyond the existing urban edge to far too great a degree relative to the objectives of sustainable development. In this respect it is contrary to national policy.
- The total amount of development that the Council has decided is needed for the Borough has been distributed it seems, according to the capacity within the urban area, followed by the use of capacity available in the edge of settlement locations selected on the basis of a very narrow and simplistic interpretation of their importance to Green Belt purposes, though even this has not been applied well or consistently.
- As a consequence the policy is inadequate in setting a strategy for the future roles and functions of different parts of the Borough. The plan is therefore not positively prepared or justified and is not consistent with national policy.
- The Council does not explain any connection between what is noted as the characteristics of the townships and the amount of development directed to each, or indicate what balance of homes and jobs and patterns of commuting that it is trying to bring about.
- The Council has not followed the Housing Technical Report recommendation that 'Halewood has a consistent shortage of housing land, and consequently a larger amount of land will be required to maintain its current proportion of the Borough population'.
- The Council should have done a proper settlement and function study and identified what they want to achieve for each of the townships, rather than relying on what they acknowledge is a 'simplistic method'.

See General Statement for further detailed comments.

**Summary of
Suggested
Changes**

- An alternative strategy is required which translates effectively what the evidence about individual places, such as Halewood, into a proper spatial strategy. This alternative approach and revised policy would recognise the current role and function of settlements and the opportunities that exist within them and around them.
- The spatial strategy should establish the broad location of development first, and do so having regard to the role and location of main centres, the economic potential of places, future population structure, the need for affordable housing, the relationship between jobs and homes, the availability of facilities and services, and movement patterns.
- The level and equity of accessibility in future should be key considerations, and be addressed by where development takes place and how transport services and facilities can be provided and supported.
- How the level of development, primarily housing and employment accommodation, is achieved and from which sources of supply - whether within urban areas or on the edge of settlements - should be the second step. Only when there is an overwhelming problem created by seeking to accommodate too much development in relation to a particular centre should a further iteration change the distribution.

- A positive evidence based approach would provide sustainable development and seek to ensure that there is direct connection between the characteristics of the townships, and the amount of development that is directed to each of the townships. This proper approach would inevitably lead to the need for more mixed use development, particularly in Halewood.
- The land promoted through these representations (Land at Lydiate Lane, Halewood) should be made available in this plan period to provide greater flexibility in the strategy, as well as to increase the amount of housing that can be delivered in the early stages of the plan and for the plan period as a whole.

See General Statement for further detailed comments.

Council Response: The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), Technical Report: Planning for Housing Growth (TR01) and Technical Report: Planning for Employment Growth (TR02) relating to housing and employment requirements, as supported by evidence in the Green Belt Study (EB08), Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04), Joint Employment Land & Premises Study (EB07) and Economic Viability Assessment (EB06).

100/1100.1/ CS1 / LC

Ms Lindsay Grey

NV Assets

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Spatial Strategy

Objection

AE - Attending Examination

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Summary of Main Issues - The policy does not assist in meeting objectively assessed requirements - review of Green Belt boundaries and consequent identification of reserved locations to be removed from the Green Belt to meet development needs should be confirmed in the Core Strategy rather than deferred to a future allocations DPD.

Summary of Suggested Changes - The boundaries of the reserve locations to be removed from the Green Belt should be confirmed as part of the current Core Strategy stage and not deferred to a future allocations DPD.

Council Response: The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), as supported by evidence in the Green Belt Study (EB08). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate.

17/1017.4/ CS1

Mr Edward Bean

Plan
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Spatial Strategy

Support

WR - Written Representation

142

**Summary of
Main Issues**

Support for Policy CS1, including:
- the focus on development of areas within or accessible from areas in need of regeneration (such as Kirkby)
- maximising Knowsley's contribution to the development of the Liverpool City Region
- the review of Green Belt boundaries to meet longer term needs

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Welcomed.

108/1108.11/ CS1 / LC

Junction Property Ltd

Plan
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Spatial Strategy

Support with Amends

AE - Attending Examination

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**Summary of
Main Issues**

- Support the priorities for development set out in the second part of the policy and agree that a high priority should be given to rebalancing housing stock by providing a wide choice of new market and affordable housing.
- Agree that a high priority should be given to the economic development of the Borough. However, in line with representations on Policy CS4, it considers that Section 2 (c) should be reworded.

**Summary of
Suggested
Changes**

Amend Policy CS1 2 (c) - clarify that it is a 'wide' range of sites and premises for new employment development.

**Council
Response:**

The Council considers that its policy approach is sound and legally compliant, and consequently the suggested change is not necessary.

Spatial Strategy

Objection

AE - Attending Examination

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**Summary of
Main Issues**

- Support the maintenance of the existing settlement hierarchy, including Halewood as a larger suburban centre
- Support the statement of a need for Green Belt review to meet longer term needs for housing and employment, and maintaining the openness of the Green Belt boundaries
- Support the objective to deliver "a wide choice of new market sector and affordable housing" provided that the Council give adequate consideration to financial viability and the type of housing delivered is dictated by the market in accordance with the SHMA (EB04)
- Considered to be not justified on the basis that the Council considers the Green Belt release is only needed to meet longer term needs for housing, whereas it has been proven that there is an immediate need to review Green Belt boundaries in order to meet short term housing requirements in certain areas of the Borough
- Not effective as it fails to make adequate provision to enable the Council to deliver its housing requirement beyond the initial first five years of the plan
- Not consistent with national policy as it would not necessarily deliver housing that reflects the current and future demographic trends, as well as local demand.

**Summary of
Suggested
Changes**

- Amend Policy CS1 (1) (e) to: "An immediate review of Green Belt boundaries to meet identified needs for housing and employment development, and maintaining the openness of the remaining Green Belt boundaries"
- Amend Policy CS1 (2) (a) to: "Provide for a mix of housing that reflects local demand, current and future demographic trends, market trends and the need of different groups in the community whilst taking steps to rebalance the housing market wherever possible"

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), Technical Report: Planning for Housing Growth (TR01) and Technical Report: Planning for Employment Growth (TR02) relating to housing and employment requirements, as supported by evidence in the Green Belt Study (EB08), Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04), Joint Employment Land & Premises Study (EB07) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate.

**Summary of
Main Issues**

- Not positively prepared as there are concerns over how the Council has assessed housing requirements – historical under-provision should be accounted for within new provision. Under delivery against RSS would require an uplift in the annual requirement to 609 dwellings per annum until 2021. This would result in an undersupply of housing before other issues are considered.
- Not justified as it is not founded on a robust and credible evidence base. The SHLAA (EB01) is not a credible evidence base for a deliverable 5 year housing supply to meet requirements (+20% to reflect Knowsley's persistent under delivery) as it has not been produced through a collaborative approach meaning the methodology and assessment of sites is flawed.
- Not consistent with the NPPF as it does not comply with the core planning principles in NPPF Para. 17. Although the Core Strategy has identified the needs for housing development it has not responded to meeting those needs or the wider opportunities for growth. The focus of development within urban areas will not provide the delivery of the widest choice of housing, including larger executive and family housing – existing urban areas are low market and regeneration areas where such housing has historically not been delivered.
- Not consistent with the NPPF as it does not comply with NPPF Para. 47. The identified housing supply, particularly within the first five years, does not provide a realistic prospect of achieving the housing supply and ensuring a choice and competition in the market of land. Significant concern over the deliverability of housing on a number of former school sites and small infill sites in poor market areas included in the Council's housing land supply within the 0 – 5 year period, particularly for a wider choice of market housing in the absence of an Economic Viability Assessment.

**Summary of
Suggested
Changes**

- Revised CS1 1. – The Spatial Development of Knowsley to 2008 and beyond will be achieved by:
- Revised CS1 1. (a). – A focus on delivering development within existing urban areas and through a review of Green Belt boundaries to meet the identified need and ensure sustainable growth.
- Revised CS1 1. (b) – With the existing urban areas, development will be focused within areas in need of regeneration and areas that are easily accessible to them.
- Revised CS1 1. (c) – A review of Green Belt boundaries will ensure the delivery of housing and employment throughout the plan period whilst maintaining the openness of remaining Green Belt boundaries.
- Revised CS1 1. (d) – As existing 1. (b) of CS1
- Revised CS1 1. (e) – As existing 1. (c) of CS1
- Revised CS1 1. (f) – As existing 1. (d) of CS1
- Revised CS1 2. – Priorities for the development of Knowsley to 2008 and beyond will be to:
- Revised CS1 2. (a) – Rebalance the housing stock by providing a wide choice of market sector, including executive and family housing, and affordable housing with support services and facilities appropriate to need.
- Amended final sentence of Para. 5.6 – One particular issue which several of the districts in the City Region have had to consider in their Local Plans is to need to review Green Belt boundaries (which were first set in 1983) to ensure the delivery of development to meet identified needs and ensure sustainable economic growth. Further details on this issue are set out in Policy CS5.
- Mention rebalancing of housing stock as a key spatial development priority within the supporting text.

Council Response: The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Planning for Housing Growth (TR01), as supported by evidence in the Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate.

72/1072.1/ CS1 / LC

The Knowsley Estate

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Spatial Strategy

Support

WR - Written Representation

142

Summary of Main Issues Support for Part 1e of Policy CS1 which contains the principle regarding review of Green Belt to meet longer term development needs and maintaining the openness of the remaining Green Belt area.

Summary of Suggested Changes n/a

Council Response: Noted and welcomed.

113/1113.3/ CS1

Mr David Hopkin

United Utilities Plc

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Spatial Strategy

Support with Amends

WR - Written Representation

142

**Summary of
Main Issues**

- Green Belt sites are often in edge of settlement or isolated locations where redevelopment could place very different demands on existing infrastructure.

**Summary of
Suggested
Changes**

- It will be necessary to consider if there is any detrimental impact on infrastructure as a result of development and look to co-ordinate the delivery of new growth with any necessary infrastructure improvements.

**Council
Response:**

The Council notes the comments received in the representation and considers that this issue has already been subject to significant ongoing discussion with United Utilities as part of the preparation of the Infrastructure Delivery Plan and in meetings on an annual basis with resolution to the extent that there are considered to be no significant constraints to the delivery of development progressed through the Local Plan. Consequently the Council has requested confirmation of this position.

119/1119.2/ CS1 / S 2 3 4

Mr Peter Ryan

Taylor Wimpey UK Ltd

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Spatial Strategy

Objection

AE - Attending Examination

142

**Summary of
Main Issues**

- Acknowledgement of need for GB review
- Element relating to review of GB should be changed to enable reserved sites to be brought forward more quickly

**Summary of
Suggested
Changes**

- Immediate requirement for a Green Belt boundary review must be acknowledged.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), Technical Report: Planning for Housing Growth (TR01) and Technical Report: Planning for Employment Growth (TR02) relating to housing and employment requirements, as supported by evidence in the Green Belt Study (EB08), Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04), Joint Employment Land and Premises Study (EB07) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested change is necessary or appropriate.

9/1009.2/ CS1

Matthew Robinson

HOW Planning

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Spatial Strategy

Support with Amends

WR - Written Representation

142

**Summary of
Main Issues**

- Support for Policy CS1, part 1(d) regarding efficient use of land and infrastructure. Emphasis on the use of previously developed land should support additional sites being identified as regeneration priorities, including vacant land at King's Business Park (map enclosed)
- Support for Policy CS1, including the identification of North Huyton and Stockbridge Village as a Principal Regeneration Area.
- Appropriate sites must be allowed to come forward to support the development priorities of the area, including vacant land at King's Business Park.

**Summary of
Suggested
Changes**

- Site identified within Kings Business Park on accompanying map should form a regeneration priority.

**Council
Response:**

Consider no soundness or legal compliance issues raised. In this regard, it is considered that the remaining undeveloped land at Kings Business Park is not of a sufficient scale to be identified as a specific regeneration priority. It is more appropriately listed in Policy CS4, thereby remaining consistent with UDP policy EC4 which is proposed to be saved until the preparation of the Local Plan: Site Allocations and Development Policies document.

13/1013.3/ CS1

Mr Jermaine Daniels

Merseyside Environmental Advisory Service

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Spatial Strategy

Support

WR - Written Representation

142

**Summary of
Main Issues**

Support Policy CS1, including encouraging the reclamation and reuse of brownfield land.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Supportive comments welcomed.

14/1014.5/ CS2

Jackie Copley

Lancashire Branch of the CPRE

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Spatial Strategy

Support

WR - Written Representation

153

**Summary of
Main Issues**

Support for the use of previously developed land as promoted through the development principles.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Welcomed.

101/1101.1/ CS2 / LC

Mrs Josephine Bennett

Plan
Order.ID

Spatial Strategy

Objection

WR - Written Representation

153

**Summary of
Main Issues**

- Concern in terms of building apartments on land that have for many years been known as open cast mining and been used for household waste disposal, including Huyton Business Park.
- Concerns in terms of subsidence is very evident in many areas of Prescott, Whiston, Huyton Quarry and Tarbock, and has potential to cause water damage.
- Concerns over methane gas arising from this type of land.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council supports its policy approach as sound and legally compliant, with appropriate strategic approaches for the legacy of minerals extraction and land quality (encompassing instability and contamination) within Policy CS2 and supplemented by the saved UDP policy ENV4, ENV5 and ENV6. The Council intends to replace the saved policies through an updated policy approach in the Local Plan: Site Allocations and Development Policies document.

Spatial Strategy

Objection

AE - Attending Examination

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**Summary of
Main Issues**

- This policy sets out worthy development principles but is entirely silent on the issue of Green Belt.
- As Green Belt has been the primary consideration in the distribution of development, and in the choice of development locations on the edge of the urban area, the policy is disingenuous.
- It is not clear how the principles set out in Policy CS2 are carried through the location of new development, particularly how they relate to the reserved Green Belt sites.

See General Statement for further detailed comments.

**Summary of
Suggested
Changes**

- The policy would be more accurate if it could make explicit how the Green Belt was to be the determining factor in identifying locations for development and within this context, how the development principles will be achieved through the development of reserve sites.
- It would be far better however , if the policy stood and what followed in the rest of the plan was consistent with the policy.
- At the moment the locations for development identified in the plan are determined far too much by easy wins and by the Council's interpretation and application of Green Belt policy, and not enough by the principles set out in Policy CS2.

See General Statement for further detailed comments.

**Council
Response:**

The Council supports its policy approach and approach to plan preparation as sound and legally compliant.

93/1093.2/ CS2 / S 1 2 4 / LC

Mr John Beesley

Beesley and Fildes Ltd / James Whittaker Associate

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Spatial Strategy

Objection

AE - Attending Examination

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Summary of Main Issues - Wholly support the submissions of Redrow and Cass Associates on Policy CS2.

Summary of Suggested Changes n/a

Council Response: The Council supports its policy approach as sound and legally compliant.

90/1090.2/ CS2 / S 1 2 4 / LC

Mr Robin Buckley

Redrow Homes

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Order.ID

Spatial Strategy

Objection

WR - Written Representation

153

Summary of Main Issues - Not positively prepared as there is no development principle relating to the key spatial development priority of rebalancing of housing stock and housing provision.
- Not justified, as it will not help ensure the achievement of social and economic objectives of sustainability, without reference to housing.

Summary of Suggested Changes - Revised Principle 1 – Promote sustainable economic and social development, tackle the causes of deprivation and narrow the gap between the richest and poorest neighbourhoods by:
- Addition of Principle 1 (d) – Delivering housing growth and rebalancing housing stock to provide an improved and wider choice of housing offer which will provide social, economic and environmental benefits, for example; increased spending power and reductions in travel to work within the Borough.

Council Response: The Council supports its policy approach as sound and legally compliant. The suggested changes are not considered necessary noting that the Local Plan: Core Strategy forms part of the development plan when taken as a whole and therefore Policy CS2 seeks to avoid repetition of development priorities and policy approaches for housing provision contained elsewhere in the plan (particularly Policy CS1, Policy CS3 and Policy CS17).

Summary of Main Issues - The local principles which this policy establishes are consistent with national planning policy guidance.

Summary of Suggested Changes n/a

Council Response: The Council supports its policy approach as sound and legally compliant, and therefore agrees with the views expressed in this representation.

Spatial Strategy

Objection

AE - Attending Examination

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**Summary of
Main Issues**

- Broadly support the wording of Policy CS2 in setting out development principles that will guide new development in Knowsley
- Concerns expressed in terms of the need to clarify in Principle 4 (g) that development of identified Green Belt Sites does not conflict with the objective of "maintaining or enhancing the tranquility of open countryside and rural areas"
- Principle 1 overlooks the economic benefits associated with the provision of new housing: jobs, investment; spending power of new residents; boost to Council rates, delivery of infrastructure
- Concern relating to the implication that every development proposal will be required to meet the full criteria in each of the 5 principles, whereas proposals may come forward which do not meet every criterion yet may still be acceptable

**Summary of
Suggested
Changes**

- Make clear that the development will only be required to support the development principles 'where appropriate'.
- Add text to Policy CS2 (1) (d): "Approving residential development which responds to the needs of the Borough's communities"
- Reword Policy CS2 (4) (g) to: "Maintaining or enhancing the tranquility of open countryside and rural areas. This also applies in Green Belt areas identified as "reserved" locations for future housing and employment development until such a time as they are brought forward for development to meet evidenced development needs."

**Council
Response:**

The Council supports its policy approach as sound and legally compliant. As a consequence, it is considered that the suggested changes are not necessary or appropriate.

**Summary of
Main Issues**

Consideration of land for housing developments should see the previously developed land given priority.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

This issue is already reflected in Policy CS2.

**Summary of
Main Issues**

- Additional criteria relating to providing accommodation for a growing and ageing population should be added
- Policy is too long and could result in unnecessary refusals or dismissals – should be set out as non-policy objectives and inform later policies
- Question the need for such a detailed and complicated policy given the presence of Policy SD1. Streamlining of Policy CS2 is required.
- Clarification needed regarding use of assessment tools in association with specific development proposals

**Summary of
Suggested
Changes**

- Extra point should be added under Principle 1 to accord with NPPF Paras 50 and 182 - 'Providing high quality living accommodation to meet the needs of a growing and ageing population'
- Clarification to be added regarding use of assessment tools
- Streamlining of the criteria in Policy CS2

**Council
Response:**

The Council supports its policy approach as sound and legally compliant, with no need to specifically replicate residential requirements in Policies CS16 and CS17, including references to Specialist and Supported Accommodation and Lifetime Homes design criteria. In addition, it is considered that the requested detail relating to assessment tools would replicate the role of and flexibility offered by Local Validation Lists. As a consequence, the Council does not consider that the suggested changes are necessary or appropriate.

Summary of Main Issues - Inconsistency of Council identification of housing land supply by the SHLAA within areas of existing Urban Greenspace and a lack of existing sports facilities in Kirkby.

Summary of Suggested Changes - Recommendation to remove the All Saints School site from the SHLAA housing sites and include as part of Policy CS21.
- Need to consider the suitability of Kirkby Sports Centre for housing in the context of shortfalls for team sports, and include the site under Policy CS21 rather than Policy CS3.

Council Response: The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Planning for Housing Growth (TR01), as supported by evidence in the Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04), Greenspace Audit (EB21), Playing Pitch Assessment & Strategy (EB22) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate.

Spatial Strategy

Objection

AE - Attending Examination

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**Summary of
Main Issues**

- Inconsistency of Council identification of housing land supply within Urban Greenspace and the lack of sports facilities in Kirkby
- Kirkby has undergone a non-stop programme of house building that leaves many areas without quality and accessible greenspace
- KRAG submitted alternative sites to the Call for Housing Sites in 2011 - KGV Playing Fields, Court Hey Park and Huyton Leisure Centre with all three sites excluded from the SHLAA on the grounds they are urban greenspace
- Policy decisions illustrate a clear inconsistency and possible discriminatory approach to provision of urban greenspace in the two areas

**Summary of
Suggested
Changes**

- Remove the All Saints School site from the SHLAA housing sites and include as part of Policy CS21
- Need to consider the suitability of the former Kirkby Sports Centre for housing in the context of shortfalls for team sports, and include the site under Policy CS21 rather than Policy CS3 to address the lack of community pitches for cricket, rugby league and union

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Planning for Housing Growth (TR01), as supported by evidence in the Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04), Greenspace Audit (EB21), Playing Pitch Assessment & Strategy (EB22) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate.

Spatial Strategy

Objection

AE - Attending Examination

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**Summary of
Main Issues**

- Broadly support the Council's attempt to use a wide range of scenarios to derive an appropriate scale of housing for the plan period, as set out in the Technical Report: Planning for Housing Growth (TR01)
- Objection to the 450 dpa figure which is not justified, relies too much on demographic and supply-led arguments, and fails to meet the affordable housing needs of the local population over the plan period
- Approach to housing growth does not support economic growth aspirations in Policy CS4 and does not consider issues of out commuting, e.g. the need to provide additional high quality homes to reverse current unsustainably high levels of commuting
- Approach is inconsistent with evidence base such as the SHMA (EB04) in terms of affordable housing shortfall
- Housing target does not reflect under delivery relative to the North West RS, and is not consistent with the approach in the adopted RS
- Policy CS3 is not effective as the residential delivery target fails to allow for flexibility should the economy recover quickly
- Approach is not consistent with national policy as it would not enable delivery of sustainable development and would not support strong and vibrant communities by providing supply of housing to meet the needs of the present and future generations
- Suggestion that 525 dpa is appropriate to reflect under delivery since 2003 and better meet affordable housing and economic needs

**Summary of
Suggested
Changes**

- Update housing evidence to meet objectively assessed development requirements
- Amend Policy CS3 to ensure delivery of sufficient levels of housing to meet demand in the Authority area, including an annual target of 525dpa (net).

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Planning for Housing Growth (TR01) relating to housing requirements, as supported by evidence in the Strategic Housing Market Assessment (EB04) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate.

**Summary of
Main Issues**

- Impact of new growth on infrastructure.
- Need to co-ordinate the delivery of development with the delivery of infrastructure improvements.
- In delivering a flexible and responsive supply of housing land it will be necessary to consider the impact on infrastructure.

**Summary of
Suggested
Changes**

- It will be necessary to consider the impact of new growth on infrastructure.
- It may be necessary to co-ordinate the delivery of development with the delivery of infrastructure improvements.

**Council
Response:**

The Council notes the comments received in the representation and considers that this issue has already been subject to significant ongoing discussion with United Utilities as part of the preparation of the Infrastructure Delivery Plan and in meetings on an annual basis with resolution to the extent that there are considered to be no significant constraints to the delivery of development progressed through the Local Plan. Consequently the Council has requested confirmation of this position.

Spatial Strategy

Objection

AE - Attending Examination

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**Summary of
Main Issues**

Support for the principle of release of land from the Green Belt for housing.

Objection to the phased release of land in accordance with maintenance of a five year supply of housing land, due to:

- the release mechanism is not in accordance with the NPPF, which makes no reference to phasing as an appropriate method to identify and update an annual supply of sites
- the deliverability of sites within the SHLAA is questioned
- the proportion of the housing requirement to be accommodated on brownfield land is too ambitious

Objection to land only being released in line with criteria in Policy CS5 as there is a case for timed release of Green Belt land at given dates when urban capacity is most likely to be exhausted.

Knowsley Lane (location 3) should come forward within the 0-5 year period, due to:

- the site could support the objectives of the North Huyton and Stockbridge Village regeneration area
- the site could have associated benefits with the area's gateway location

**Summary of
Suggested
Changes**

Amend Part 3 of Policy CS3 to including reference to site specific case for time release of land at a given date to ensure that a five year supply of deliverable sites is maintained at all times.

**Council
Response:**

The Council's approach to phasing of potential release of reserved Green Belt locations is justified through the Council's evidence base. This covers both the level of development to be achieved within these locations (Technical Reports) and the suitability of Green Belt locations to meet development needs (Green Belt Study - EB08). The Council is content that its approach is reflective of the wider objectives of the Plan, including a focus on urban regeneration and brownfield development.

**Summary of
Main Issues**

- Not legally compliant as it does not conform to RSS in relation to housing provision and in particular housing undersupply. Shortfall of 1,894 dwellings during 2003-2012 should be added to the plan period figure of 8,100, therefore requiring an annual average of 555 dpa. As the new housing provision figure does not account for making up historic under-provision, the Council could account for this under-provision by bringing forward selected Green Belt sites as part of sustainable urban extensions in the 0 – 5 year period.
- The density requirement is not consistent with NPPF Para 47 and Government policy since 2010 – housing density should reflect local circumstances. The range of densities within Table 4.2 of the SHLAA (EB01) does not reflect local circumstances.
- Not positively prepared as it does not provide a realistic strategy for supply and phasing of land for new development.
- Not justified as it is not founded on a robust and credible evidence base and does not provide the most appropriate strategy for delivering housing need and growth.

**Summary of
Suggested
Changes**

- Amended CS3 1. – Suggested change to housing requirement to 10 000 new dwellings at an annual average of 555 dwellings per annum, with additional reference to accounting for ‘historic under-provision as well as future requirements’.
- Amended CS3 3. - Suggestion of revision to ‘ensure at least a five year supply of deliverable sites, plus any required buffer as set by the NPPF and other relevant Government Policy, is maintained at all times’.
- Amended CS3 3. – Suggested addition of a reference to the ‘supply of housing being monitored annually and the location and phasing of development being subject to review and change’.
- Amended CS3 4. – Suggested addition of a reference to ‘location’ of new housing delivered.
- Replacement of CS3 5. with ‘Developments will need to ensure an effective and efficient use of land through an appreciation of the site’s context and promoting the principles of good urban design. Applications for housing development will need to demonstrate that the density of the proposal is appropriate to the area and helps to meet an identified need for housing such as executive housing and larger family housing to help rebalance the existing housing stock’.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant. Appropriate explanation and justification of the housing requirement is included within the Technical Report: Planning for Housing Growth (TR01), as supported by evidence in the Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04) and Economic Viability Assessment (EB06). Furthermore the Council considers that approaches in Policy CS3 to five year housing land supply and density remain consistent with national policy, therefore the suggested changes are not necessary.

Spatial Strategy

Objection

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**Summary of
Main Issues**

- The approach taken to housing provision in the plan fails the tests of soundness.
- The requirement should be set out, based upon an objective assessment of need. This should examine demographic and economic evidence, as well as giving considerable weight to the need for affordable housing.
- The need for clear distinction between the requirement and planned provision, as well as for an assessment of the options and implications if the requirement is not to be met, has been a feature of Core Strategy Inspectors findings since the Framework. The target is certainly lower than the requirement would be if this were identified by proper process undertaken objectively.
- The level of provision in the SHMA is much higher than the level of provision the Council has chosen to make and this vital evidence has effectively been ignored by the Council. The reasons for this have not been explained, in proper planning terms at least.
- There has to be explicit consideration of whether there is an unmet need from neighbouring authorities.
- The Council's way of discharging its duty to cooperate seems to be to rely on the Liverpool City Overview Study. Relevant authorities maintaining the Regional Spatial Strategy housing requirements does not feel like an evidence driven approach and is not what the duty to cooperate has been included in legislation and national policy to achieve.
- If some authorities in the sub region make provision for a level of housing less than an evidence based housing requirement for their districts, and explicitly or implicitly leave other authorities to deal with the under provision, then the soundness of plans of other authorities is at risk. The Knowsley Core Strategy does not explain where it stands on this matter, giving further concern that the housing requirement has not been objectively assessed and may again be too low.
- The evidence demonstrates that a considerable backlog exists from undersupply against the Regional Strategy target, and that there is a need to incorporate a 20% buffer.
- It is not appropriate for the 20% buffer to be delegated to the AMR for annual review.
- The policy is concerned with provision and as it stands the policy is unsound because it is not meeting full need. The policy is not justified and as such is contrary to national policy.
- Not clear how backlog comprises part of the calculation of the annual provision figure.
- The Council seeks to spread the requirement arising from backlog across the whole plan period, instead of dealing with the entire backlog within the next five years.
- The five year housing land supply requirement would be far higher than the stated figure of 2 250 dwellings because the whole of the backlog of 1 861 should be included within the first 5 years.
- In addition the distribution of the district requirement to townships is solely based on the available capacity that has been assessed according to the Green Belt review. Such a capacity based approach is very simplistic and hardly amounts to a strategy, in the sense that there is no conscious shift in the existing situation proposed to address what the evidence says about parts of the Borough at present and what role they should play in the future.
- Maintaining a proportionate level of growth would hardly amount to a strategy, in the sense that there is no conscious shift in the existing situation proposed to address what the evidence says about parts of the Borough at present, or to help bring about any particular role for Halewood in the future.
- The Council have not identified any alternatives for housing growth distribution which could be based on a robust and credible evidence base.
- Revisions to the Preferred Options approach with an allocation of 19% of the total (inadequate) provision to Halewood is not

due to a proper recognition that Halewood should provide more development to respond to the opportunities that exist to enhance the role and contribution of this settlement. Rather it appears that it arises from a recalculation of the capacity of the land the Council deems to be acceptable that is in Halewood relative to the Borough.

- Using a capacity based approach to determine the strategy for development of a place is entirely inappropriate, at odds with good practice in plan making and specifically fails the requirement of a sound plan that it be 'positively prepared'.

See General Statement for further detailed comments.

Summary of Suggested Changes

- Recognise that provision should be made for a higher figure to address the objectively assessed needs, starting with the findings of an up to date SHMA.
- Ensure the five year land supply and trajectory adequately includes the full shortfall / backlog.
- Include a 20% buffer to ensure that there is a sufficient supply of sites for adequate choice and competition.
- Indicate what role is intended for Halewood - as in all parts of the Borough - for the future and as a consequence of this evidence recognise that Halewood has more potential to accommodate growth in this excellent location.
- Strongly suggest that a greater proportion of the plan's Borough housing provision should be directed to Halewood than would simply maintain the existing pattern.
- The land promoted through these representations (Land at Lydiate Lane, Halewood) should be made available in this plan period to provide greater flexibility in the strategy, as well as to increase the amount of housing that can be delivered in the early stages of the plan and for the plan period as a whole.

See General Statement for further detailed comments.

Council Response:

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification relating to housing land supply and requirements within the Technical Report: Planning for Housing Growth (TR01), as supported by evidence in the Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate.

**Summary of
Main Issues**

- Support for Policy CS3, including housing target and distribution of housing to the North Huyton and Stockbridge Village area.
- Agree that at least 33% of all new housing developments over the plan period will be delivered in Huyton and Stockbridge Village.
- There are a number of sites within the area which can support housing growth, including vacant land at King's Business Park.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised.

**Summary of
Main Issues**

- Objection to reliance on delivery of all currently consented, allocated and identified brownfield land ahead of any release of Green belt land, due to previous under-provision of housing delivery on land in the urban area.
- Land within the urban land supply should be interrogated, including asking why sites have not been developed already, whether sites are suitable, whether sites are attractive to the market, whether they are just providing numbers in unattractive locations, contrary to Council aims to widen the mix and type of housing, provide better housing in more attractive locations and meet the needs for numbers.
- Objection to the Council is ignoring the NPPF 20% buffer requirement, which creates even further under-provision. This suggests that the Council needs to set even more demanding housing targets to deliver against forecasts. Further failure to delivery in the early part of the plan period will add to the burden.

**Summary of
Suggested
Changes**

- Significant forward planning and a contingency plan to bring forward a phased introduction of Green Belt sites is required to avoid under-delivery against the Plan.

**Council
Response:**

The Council's approach to identifying urban housing land supply has been undertaken in a robust manner through the Strategic Housing Land Availability Assessment (EB01). The approach in Policy CS3, also CS1 and CS2, prioritises urban and brownfield regeneration in accordance with national policy.

The Council considers that its approach is compliant with NPPF requirements regarding the 20% buffer. This relates to the amount of land to be identified as deliverable within a five year period, rather than impacting on the overall level of housing delivery to be planned for.

**Summary of
Main Issues**

The scale of new residential development proposed is unjustified. Half of the amount of housing is justified.

The target proposed is too high even accounting for planned demolitions, stabilisation aspirations and the NPPF buffer of 5% or 20%. This is due to:

- the trend of population decline since the 1970s
- the anticipated growth up to 2028 is 4,000 people - this would create 2,800 dwellings required
- there is no anticipated Government regeneration investment likely to cause further demolitions, therefore 5070 dwellings would be for people moving in to Knowsley, equal to 12,500 people

Much of the new housing could be built in Principal Regeneration Areas, including the construction of executive homes to ensure balanced communities. Any release of Green Belt land is likely to hamper residential development in regeneration areas, as house builders prefer higher value greenfield sites.

Support for the use of "plan, monitor, manage" approach.

**Summary of
Suggested
Changes**

Housing target proposed should be halved to 225 dwellings per annum.

**Council
Response:**

The Council considers that its approach to planning for housing growth is fully justified by evidence, including the Technical Report: Planning for Housing Growth (TR01).

**Summary of
Main Issues**

- Immediate requirement for Green Belt review should be acknowledged. Without Green Belt release, the continued shortfall of housing delivery is likely to be continued.
- The amount of employment land may not be achieved and serviced with the existing housing target without unsustainable levels of in commuting
- The need to reverse in-commuting for highly paid jobs has not been factored in to setting the housing target
- Housing target would fail to meet affordable housing needs identified in the Strategic Housing Market Assessment (EB04) and should be revised
- Housing target is not consistent with the RS target, and instead reflects a reduction on the RS target - target of 525dpa should be used
- The NPPF 20% buffer should be applied to the housing projections. This would result in a more flexible approach to sites and increased ability to meet housing need.
- Failure to acknowledge how previous years of undersupply will be reflected in targets
- Failure to acknowledge the need to identify sites to meet the application of the NPPF 20% buffer

**Summary of
Suggested
Changes**

- A revised target of 525dpa should be used to reflect the RS target and undersupply, although this would still not meet affordable housing need
- A 20% buffer should be added to the proposed Core Strategy housing projections to reflect NPPF requirements
- Policy amendments are required to encourage the prompt release of Green Belt sites

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Planning for Housing Growth (TR01) relating to housing requirements, as supported by evidence in the Strategic Housing Land Availability Assessment (EB01) and Strategic Housing Market Assessment (EB04). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate.

**Summary of
Main Issues**

Consideration of land for housing developments should see the previously developed former Bridgefield Forum site given priority over any other land in Halewood.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council's approach within Policy CS2, CS3 and within the wider Core Strategy is to deliver new residential development within the Borough's urban area, including on UDP housing allocations such as Bridgefield Forum. It is not appropriate to identify a particular site as a primary priority, given the need to supply a range and choice of housing sites to accommodate new dwellings over the plan period. The Council is content that its phasing mechanism prioritises development in the urban area, including on previously developed sites.

95/1095.3/ CS3 / S 1 2 3 4

Dr A Richardson

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Spatial Strategy

Objection

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**Summary of
Main Issues**

- Question need for housing on green fields when Huyton, Prescot, Whiston and Knowsley have innumerable recently built homes, flats and purpose built developments all over the area which remain unoccupied.
- Availability of brownfield sites which could be developed and allocated to housing development.
- Population of Knowsley is on a declining curve.
- Demand is associated to absorbing immigration pressure in England and Wales over the last ten years.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Planning for Housing Growth (TR01) relating to housing requirements, as supported by evidence in the Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04) and Economic Viability Assessment (EB06).

93/1093.3/ CS3 / S 1 2 4 / LC

Mr John Beesley

Beesley and Fildes Ltd / James Whittaker Associate

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Objection

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**Summary of
Main Issues**

- Wholly support the submissions of Redrow and Cass Associates on Policy CS2.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council supports its policy approach as sound and legally compliant.

Spatial Strategy

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**Summary of
Main Issues**

- The plan would not provide for a 15 year supply after adoption, the Core Strategy is unlikely to be adopted before December 2013 at the earliest and there may be further slippage on this date.
- The level of housing provision is well below that of North West RS Policy L4 as it is not meeting the large under provision between 2003 - 2010. If this shortfall is to be made up over the plan period, the housing requirement would have to be increased to 525 dwellings per annum at a minimum.
- The shortfall of the RS housing provision cannot be considered in general conformity with the RS, a mandatory requirement of the 2004 Act so long as RS exists (NPPF footnote 41) - revocation of RS has not yet occurred and until it is revoked the Core Strategy cannot be considered to accord (see Cala Homes v SoS for CLG).
- The proposed level of housing provision is also well below the Knowsley Strategic Housing Market Assessment and the Knowsley Housing Needs Study - does not accord with the NPPF requirement relating to full objectively assessed needs and Para. 159 relating to the SHMA.
- Although the proposed level of 450 dwellings per annum is above the CLG 2008 based population and household projections, this does not take account of the aspirations and policies of the Council, and the Vision for Knowsley.
- Welcome recognition that it will maintain a five year supply of deliverable housing sites at all times, however the policy suggests that this requirement is treated as a maximum. Phasing should not be arbitrary and there is no support in national policy to treat the five year supply as a maximum. Section 3 should be reworded to better reflect the housing trajectory and the reality that GB sites will need to be released very early in the plan period if a 5 year supply is to be maintained.
- Object to footnote 72 as it suggests that no account should be taken in the calculation of the five year requirement of any shortfall in provision that may have built up since the start of the plan period. This is contrary to established practice in the SHLAA.
- It is considered that a buffer of 20% on top of the five year requirement is required as there is a record of persistent under delivery against the RS average annual housing target.
- Objection to the final sentence of Section 3 states that Green Belt land will only be released in line with the criteria set out CS5.
- It is considered that the SHLAA over-estimates potential deliverability in the 0-5 and 6-10 year periods. Therefore the Council does not have a five year supply now or in the period up to the adoption of the Site Allocations / Development Policies DPD.
- It is considered that the indicative guidelines for the distribution of housing development should recognise the potential contribution of the Prescot and Whiston area. This is due to the area being high demand / value, having significant employment generation potential and being within a sustainable location.
- Support for recognition within CS3 of the need to rebalance the housing market. However further emphasis should be given to aspirational family housing as this a key issue in both sub-regional and local housing strategy documents.

**Summary of
Suggested
Changes**

- To comply with the NPPF and allow for potential slippage in plan preparation, the period covered by the Core Strategy should be extended at least to the end of March 2029 and preferably the end of March 2030.
- Replace Section 3 of Policy CS3 with 'A five year supply of deliverable housing sites will be maintained at all times. The release of land for housing development will be phased so that the most sustainable sites are released first, including previously developed land within the existing urban area'.
- Footnote 72 should be clarified to address inconsistency with established practice and contradiction in the SHLAA.

- Need for additional aspirational family housing should be explicit.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification relating to housing land supply and requirements within the Technical Report: Planning for Housing Growth (TR01), as supported by evidence in the Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate.

Spatial Strategy

Objection

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**Summary of
Main Issues**

- The Plan is unsound in terms of housing numbers, supply and the availability of deliverable housing land
- Insufficient provision for affordable housing within the Policy approach
- Provision does not account for RSS shortfall between 2003 – 2010 of 1,304 dwellings – housing requirement should be 9,404 dwellings over plan period or at least 522 dwellings per annum
- SHMA has not considered the actual housing need for market and private housing, simply relying on the RSS requirement
- Core Strategy ignores the assumptions in the SHMA in terms of meeting backlog fails to meet the identified need for housing
- The concept of supporting re-balancing of the housing market to better meet housing needs and demands arising in Knowsley is not set out clearly and it would not be appropriate for this to be explained in the SPD
- The Council's Housing Trajectory appears to demonstrate over-estimation of supply with a significant leap in delivery from the last recorded year that will not be achieved in the current year. This demonstrates that the Council's evidence in the SHLAA which is being relied upon is fundamentally flawed

**Summary of
Suggested
Changes**

- Explain what is meant by the rebalancing the housing market concept
- Policy CS3 should be amended to reflect the housing need in accordance with RSS as a minimum. A target of at least 522 dwellings per annum should be included.
- The SHMA should be updated to properly identify current needs in accordance with NPPF Para 47
- The SHLAA should be updated to better demonstrate whether or not the Council are able to identify and update annually a supply of specifically deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 20%

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Planning for Housing Growth (TR01) relating to housing requirements, as supported by evidence in the Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate.

**Summary of
Main Issues**

Objection to the policy as it would be premature to consider the release of Green Belt land in Knowsley for residential development, due to:

- There is no certainty that the population of Knowsley will increase.
- There is potential for higher density, through well-planned and good quality high rise developments in Knowsley.
- There is potential to provide housing in areas which are presently in retail use.
- Changes to housing benefit may have an effect on the type of houses required. This would entail housing being provided at higher densities in some areas to provide smaller units that may become in demand.
- Knowsley has a large number of vacant properties.
- Knowsley cannot be considered in isolation. No assessment appears to have been made of the potential of neighbouring authorities to accommodate some of Knowsley's predicted housing requirements. Evidence shows that there is sufficient capacity in the Liverpool City Region to accommodate new housing. Shortfalls arising in Knowsley could be catered for in Liverpool, which has a large housing capacity including: vacant properties, potential development sites, additional stock becoming available due to the building of student accommodation in the city centre, potential for expansion of city centre housing stock and 10,000 new homes planned within the Liverpool Waters development.

Further monitoring of population, demographics and housing completions in Knowsley and neighbouring areas should be carried out.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The Council is satisfied that its approach to securing housing growth is sound and justified by a range of evidence, including the Technical Report: Planning for Housing Growth (TR01).

**Summary of
Main Issues**

Knowledge and expertise of housebuilders must be used to inform policy formulation and plan making.

Objection to policy CS3 due to:

- Lack of conformity with NPPF regarding the use of evidence base to ensure that the Plan meets the full, objectively assessed needs for housing. The housing target is less than the requirement identified in the Strategic Housing Market Assessment (EB04). All opportunities to meet further growth and ensure wide choice and competition in housing land options should be pursued.
- The poor levels of completions highlight the challenging climate for housebuilders. There is a need to plan for a substantial scale of new housing to ensure delivery, including planning for a surplus in the quantity of new homes and identifying additional strategic sites and Green Belt locations for residential development.

Support for the proactive decision to review the Green Belt boundary, due to shortfall in supply of housing.

**Summary of
Suggested
Changes**

- Further housing land options should be pursued.

**Council
Response:**

The Council considers its approach in Policy CS3 is sound. The rationale for the setting of the housing target is fully explained and justified in the Technical Report: Planning for Housing Growth (TR01). The Council considers that its approach is compliant with the NPPF, including planning proactively for objectively assessed needs.

Spatial Strategy

Objection

AE - Attending Examination

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**Summary of
Main Issues**

- It is not justified to build on Green Belt as the housing study is not based on up to date and reliable evidence.
- Assumptions made in the SHMA (EB04), SHLAA (EB01) and JELPS (EB07) are queried
- The land is not needed as the figures were based on a buoyant economy which is not the case now due to the recent recession and lack of demand
- could surplus employment land be used for housing?
- Could higher density be used so less land is required? Finance is not available (mortgage availability) limiting demand not the lack of available and deliverable sites.

**Summary of
Suggested
Changes**

- Recommend withdrawal of proposal to build on farmland at Whiston which is designated as Green Belt to make it relevant to the economic climate and compliant with national policy.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03) and Technical Report: Planning for Housing Growth (TR01) relating to housing requirements, as supported by evidence in the Green Belt Study (EB08), Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested changes are necessary.

113/1113.5/ 5.20 CS3

Mr David Hopkin

United Utilities Plc

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Spatial Strategy

Support with Amends

WR - Written Representation

162

Summary of Main Issues - The development of any windfall site has the potential to place unforeseen demand on infrastructure, this is especially the case where the sites are large.

Summary of Suggested Changes - It will be necessary to carefully consider the impact of windfall development on existing infrastructure.

Council Response: The Council notes the comments received in the representation and considers that this issue has already been subject to significant ongoing discussion with United Utilities as part of the preparation of the Infrastructure Delivery Plan and in meetings on an annual basis with resolution to the extent that there are considered to be no significant constraints to the delivery of development progressed through the Local Plan. Consequently the Council has requested confirmation of this position, noting that infrastructure issues relating to windfall development will be subject to the requirements of Policy CS27.

14/1014.4/ 5.20 CS3

Jackie Copley

Lancashire Branch of the CPRE

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Spatial Strategy

Objection

WR - Written Representation

162

Summary of Main Issues Windfall sites should be included in the land supply to prevent unnecessary release of Green Belt land.

Summary of Suggested Changes n/a

Council Response: The Council considers its approach to the treatment of windfall sites is justified within its Strategic Housing Land Availability Assessment (EB01) and is in accordance with national policy.

73/1073.5/ 5.21 CS3 / S 1 2 3 4 / LC

Mr Andy Frost

Frost Planning

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Spatial Strategy

Objection

AE - Attending Examination

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**Summary of
Main Issues**

Paragraph 5.21 is too prescriptive on the preferred location of future housing. It fails to take account of market realities and the need to ensure a five year supply of deliverable housing by building in areas of highest demand.

**Summary of
Suggested
Changes**

The narrative should be amended to allow new housing to be concentrated in areas of not only the highest need but also highest market demand (e.g. land south of Whiston) and where delivery can be effectively guaranteed.

**Council
Response:**

The Council considers its approach is sound and informed by evidence. Locations for housing growth are identified in the Strategic Housing Land Availability Assessment (EB01), as well as in Policy CS5 in terms of Green Belt locations. The Council considers that its approach to housing growth will meet wider plan objectives for regeneration and rebalancing the housing market.

113/1113.6/ 5.22 CS3

Mr David Hopkin

United Utilities Plc

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Spatial Strategy

Support with Amends

WR - Written Representation

164

**Summary of
Main Issues**

- Green Belt sites are often on the edge of settlement or isolated locations where redevelopment could place very different demands on existing infrastructure.

**Summary of
Suggested
Changes**

- It will be necessary to consider the impact on infrastructure as a result of redevelopment.
- It may be necessary to co-ordinate the delivery of any development with the delivery of infrastructure improvements.

**Council
Response:**

The Council notes the comments received in the representation and considers that this issue has already been subject to significant ongoing discussion with United Utilities as part of the preparation of the Infrastructure Delivery Plan and in meetings on an annual basis with resolution to the extent that there are considered to be no significant constraints to the delivery of development progressed through the Local Plan. Consequently the Council has requested confirmation of this position.

**Summary of
Main Issues**

- The proposed phasing policy giving first priority to development of land in the urban area and associated phasing delays delivery of housing to meet identified needs is flawed and insufficient reference to the presumption in favour of sustainable development. This does not comply with Paras. 14, 47, 49 and 50 of the NPPF.
- The housing trajectory is flawed as it should include historic under-delivery of housing identified in the SHLAA (EB01) and the annual target should be amended to include this figure, meaning the Local Plan is not based on a strategy which seeks to meet the objectively assessed housing development requirements of the Borough as required by Para 47 of the NPPF.
- Historic under-delivery not accounted for in evidence base or sought to be addressed in the short term and impacts on phasing of housing delivery in first five years. Knowsley does not have an identified 5 year supply plus the necessary 20% buffer for persistent under delivery of housing when taking account of the historic under supply. The Local Plan would be immediately out of date in terms of housing supply and therefore ineffective.
- Housing policies fail to be effective as having identified in the SHMA (EB04) the need to bring forward a mix of housing types and sizes to meet the needs of all households and to improve the quality of the housing offer, the Local Plan fails to address these major issues.
- Present wording of policies is unnecessarily restrictive in maintaining a five year housing supply at all times, and would only have the effect of delaying development of suitable sites.

**Summary of
Suggested
Changes**

- Part 3 of Policy CS3 should be amended to explicitly refer to the need to address the historic housing undersupply in the first five years of the local plan period.
- The phasing elements of CS3 should be deleted or amended to allow the development of eminently sustainable and deliverable sites such as at Bank Lane, Kirkby.
- Use of the term 'five year supply' requires clarification in the glossary or as reasoned justification to ensure that this is correctly taken to mean 'the minimum supply' with appropriate buffer as required by the NPPF.
- Re-draft the relevant sections of the SHLAA (EB01) to reflect up-to-date Government policy and guidance.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant. Appropriate explanation and justification of the housing requirement and housing land supply position are included within the Technical Report: Planning for Housing Growth (TR01), as supported by evidence in the Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04) and Economic Viability Assessment (EB06). As a consequence the suggested changes are not necessary.

Spatial Strategy

Support

WR - Written Representation

Summary of Main Issues Support for the statement regarding facilitating employment development "of the right type and in the right location".

Summary of Suggested Changes n/a

Council Response: Welcomed.

Spatial Strategy

Objection

AE - Attending Examination

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**Summary of
Main Issues**

- Support for the general aims set out in the first part of CS4 (Overall Employment Development Strategy), in particular the aims of meeting the employment needs of existing and emerging market sectors and encouraging mixed use schemes.
- Section 1b) should be reworded to remove undue emphasis on the quantity and make reference to providing land of an appropriate type and quality.
- Support for Section 1c) of CS4 as large mixed use development can play a major role in reducing the need to travel.
- CS4 states that 183.5 hectares of employment will be provided over the plan period of the Core Strategy. This is a significant reduction from proposed provision of 216.5 ha in the Preferred Options Report.
- Support for the use of historic take-up rates in the assessment of employment land requirements and agreement that econometrics projections do not provide a reliable basis for projections.
- It is considered that 20% should be added to the historic take-up rate to allow for range, choice and the “churn” factor.
- In addition to a flexibility allowance (20%), it is considered that the Core Strategy should plan for an increase in the long-term past take-up rate. This is due to the average over the last 17 years being unduly influenced by Knowsley’s poor performance since 2003/4 and particularly since 2009.
- It is considered that the Core Strategy should continue the Regional Strategy requirement for an increase in take-up rates for Merseyside of 18%. It is considered that this approach would allow Knowsley to improve its economic performance and be consistent with national policy.
- The strategy does not identify which employment locations are capable of meeting the needs of the targets sectors identified by the LEP and Economic Regeneration Strategy. If the analysis had been carried out it would have shown Knowsley’s existing supply to be deficient in sites appropriate for logistics / distribution, advanced manufacturing, knowledge based industries and high amenity business parks.
- It is considered that Knowsley’s existing supply lacks large sites within the M62 corridor and sites with potential to share future growth associated with Liverpool Airport.
- It is considered that “Cronton Colliery and adjacent land” is well placed to meet demand for target sectors and has a range of positive attributes including motorway access, opportunities for sustainable transport and mixed use development (when considered cumulatively with land to the north).
- It is considered that the implication of Section 1 of CS4 will result in the release of the Cronton Colliery site being some way in the future. As a result the existing poor employment land offer will continue and development opportunities will be missed.

**Summary of
Suggested
Changes**

- Amend Section 1 (b) to 'Provide sufficient land of the appropriate type and quality to meet the wide range of employment development needs to 2028'.
- The Core Strategy should provide for employment provision of at least 313ha, including an allowance for 20% uplift in past take up rates and 20% flexibility factor for range and choice.
- “Cronton Colliery and adjacent land” should be designated as a strategic site as it can balance the existing portfolio of employment opportunities, including provision of sites suitable for manufacturing, knowledge based industries and large scale logistics.

Council Response: The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification relating to employment land supply and requirements within the Technical Report: Planning for Employment Growth (TR02), as supported by evidence in the Joint Employment Land and Premises Study (EB07) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate. In this regard, it should be noted that the Council considers that there is some misinterpretation in this representation in terms of the application of the Policy CS5 phasing mechanism for Green Belt release, which the Council considers to incorporate sufficient flexibility to respond to needs for size, location, type and suitability of land to meet NPPF requirements in terms of sustainable economic growth.

101/1101.4/ CS4 / LC

Mrs Josephine Bennett

Plan
Order.ID

Spatial Strategy

Objection

WR - Written Representation

169

Summary of Main Issues - What type of employment?
- Businesses are closing down rapidly

Summary of Suggested Changes n/a

Council Response: The Council supports its policy approach as sound and legally compliant. Appropriate explanation and justification of the employment land requirements in the Local Plan are included within the Technical Report: Planning for Employment Growth (TR02), as supported by evidence in the Joint Employment Land and Premises Study (EB07).

Spatial Strategy

Support

WR - Written Representation

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**Summary of
Main Issues**

- Support for Knowsley's approach of reducing the employment land requirement from 216.5 ha (up to 2027) to 183.5 ha (up to 2028) following re-examination post Preferred Options with obvious implications for both the size of the shortfall to meet anticipated demand, and the consequent pressure for Green Belt release. This satisfactorily addresses a concern raised by Liverpool during consultation about the need for Knowsley to fully and robustly evaluate potential development land supplies in existing urban areas before releasing sites from the Green Belt.

- The justification text for Policy CS4 which acknowledges the need for Knowsley to "have regard to the situation in adjoining districts (particularly Liverpool and St. Helens) given the close commuting links which exist with these areas from much of Knowsley", in considering the timing of provision of new employment areas, is welcomed.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council supports its policy approach as sound and legally compliant and therefore welcomes this comment.

Spatial Strategy

Support

WR - Written Representation

169

**Summary of
Main Issues**

Support for Policy CS4.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Welcomed.

**Summary of
Main Issues**

- Plan is not sufficiently flexible or positive to meet the needs of all employment sectors, including logistics, for which there is high demand and specific need (market evidence supplied)
- Liverpool Superport will bring its own needs for logistics facilities, Axis Business Park is potentially the most suitable site nearest to the port that will be able to deliver the type of modern units occupiers will require
- Other business locations and identified GB locations are not well suited to supporting logistics development, including in site size, location and quality (market evidence supplied)
- Failure to make adequate provision for the logistics sector means failing to deliver objective to ensure that a range of sites and premises by 'size, location, type and availability' are available
- Quantum of employment land needed should include 20% uplift as per JELPS (EB06), as it will otherwise inhibit flexibility in employment land for all sectors which is counter to the aims of the NPPF – more flexibility is needed if the Council is accord with NPPF Para 20
- Policy should state that priority will be given to urban locations unless there are employment requirements that cannot be met in these locations and which necessitate the development of reserve GB locations. This should be reflected in the phasing
- Sites including South Prescott may not be available for employment development and will need to be replaced
- There could be a case for accepting that a greater number of employment sites in Knowsley are unsuitable for modern business and that a more fundamental rationalisation is required, noting many sites are not of high quality (JELPS) and of limited appeal to the commercial market

**Summary of
Suggested
Changes**

- Amend Policy CS4 Policy (2) - add reference to 'additional buffer of 20%' and 'unless, exceptionally, there are employment requirements that cannot be met in these locations and which necessitate the development of reserve sites in the Green Belt'.
- Amend Policy CS4 Policy (3) - replace 'will only be developed in line with the overall development principles in Policy CS2 Development Principles and the phasing mechanisms set out below in Policy CS5 Green Belt' with 'will be developed only in accordance with Section 2 of the Policy above, and for land not required to meet exceptional needs, in line with the overall development principles in Policy CS2 Development Principles and the phasing mechanisms set out below and in Policy CS5 Green Belt'.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant. Appropriate explanation and justification of the employment land requirements in the Local Plan are included within the Technical Report: Planning for Employment Growth (TR02), as supported by evidence in the Joint Employment Land and Premises Study (EB07). As a consequence the suggested changes are not necessary.

**Summary of
Main Issues**

- The distribution of employment provision does not echo the distribution of housing provision. It would be desirable for the level of jobs for which provision is made in each township to at least be in balance to maintain present patterns and avoid increasing commuting into or out of townships.
- The Council has simply taken all existing commitments as the starting point to meet employment requirements.
- Employment distribution is mismatched to housing, with Kirkby at 43% having additional employment land in excess of the housing allocation of 15% of the housing provision. Both Huyton at 15% and Halewood at 11.8% are under provided for in employment terms.
- Halewood currently has no sites with planning permission and one allocation, with none proposed in the Submission document, whilst receiving 19% of future housing. The combination of the existing and proposed provision will lead to a reduction in the opportunity for people to live and work in Halewood.
- The Council makes no attempt to address the geographical imbalance of the existing employment provision, in fact it exacerbates the problem with both Halewood and Huyton continuing to have an under provision of employment land.
- Jaguar Land Rover is identified as a priority for employment, but no further land is allocated for employment purposes at Halewood to supplement the existing allocation.
- The existing allocation in Halewood is held for Jaguar Land Rover expansion and is consequently not available for other potential employers. This position effectively leaves Halewood with no additional or alternative employment land provision at all.
- It is a missed opportunity to ignore the potential for employment growth in this accessible location, especially for manufacturing related business which could be attracted to premises in close proximity to the car plant.
- The result of the Core Strategy as it currently stands would be increased commuting for Halewood residents who don't happen to work for Jaguar.
- The approach taken to employment land distribution demonstrates that this is a supply driven strategy which does not take account of the needs of the different townships nor does it provide a robust spatial strategy for development over the plan period.
- It seems entirely possible that within the plan period further employment land will need to be found in Halewood.

**Summary of
Suggested
Changes****Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Planning for Employment Growth (TR02) relating to employment requirements, as supported by evidence in the Joint Employment Land & Premises Study (EB07).

Spatial Strategy

Objection

AE - Attending Examination

169

**Summary of
Main Issues**

- It is not justified to build on Green Belt as the housing study is not based on up to date and reliable evidence.
- Assumptions made in the SHMA (EB04), SHLAA (EB01) and JELPS (EB07) are queried
- The land is not needed as the figures were based on a buoyant economy which is not the case now due to the recent recession and lack of demand
- Could surplus employment land be used for housing?
- Could higher density be used so less land is required? Finance is not available (mortgage availability) limiting demand not the lack of available and deliverable sites.

**Summary of
Suggested
Changes**

- Recommend withdrawal of proposal to build on farmland at Whiston which is designated as Green Belt to make it relevant to the economic climate and compliant with national policy.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03) and Technical Report: Planning for Employment Growth (TR02) relating to employment requirements, as supported by evidence in the Green Belt Study (EB08), Joint Employment Land & Premises Study (EB07) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested changes are necessary.

Spatial Strategy

Objection

AE - Attending Examination

169

**Summary of
Main Issues**

Support for the principle of the release of land from the Green Belt for employment use.

Objection to Part 4 of Policy CS4, due to:

- it is questioned whether it would be viable for developers to locate employment in areas where there are issues of deprivation, including the Principal Regeneration Areas
- Land at Knowsley Lane (location 3) should not be subject to phasing restrictions and should come forward for development within a 0-5 year period, to support regeneration objectives and to kickstart other employment initiatives
- The Green Belt Technical Report (TR03) indicates that the development of land at Knowsley Lane (location 3) could have associated benefits with the area's gateway location in relation to the North Huyton and Stockbridge Village Principal Regeneration Area

**Summary of
Suggested
Changes**

Land at Knowsley Lane (location 3) identified for housing and employment should come forward within the first 0-5 year period. Its development could help tackle deprivation, re-balance the housing market and create jobs to serve regeneration.

**Council
Response:**

The Council's approach to phasing of potential release of reserved Green Belt locations is justified through the Council's evidence base. This covers both the level of development to be achieved within these locations (Technical Reports) and the suitability of Green Belt locations to meet development needs (Green Belt Study - EB08). The Council is content that its approach is reflective of the wider objectives of the Plan, including a focus on urban regeneration and brownfield development.

**Summary of
Main Issues**

- Objection to Policy CS4 part 2 as the approach does not comply with NPPF guidance regarding the long term protection of employment sites for which there is no reasonable prospect of that site being brought forward for employment use (e.g. vacant land at King's Business Park)
- Support for Policy CS4 part 7, which allows for other types of development to come forward on allocated employment land, subject to set circumstances.
- Objection to Policy CS4 part 5 and 6, as further office development at King's Business Park should not have to be justified through demonstration of a sequential approach. PPS4 Practice Guidance indicates that town centre and business park office uses serve different markets.

Further employment development at King's Business Park would help contribute to the mix of employment floorspace available in Knowsley.

**Summary of
Suggested
Changes**

- Policy CS4 should be amended to avoid the long term protection of the remainder of the site at King's Business Park for employment use, and to allow for an element of residential development on the site in order to cross-subsidise any further employment development.
- Policy CS4 should be amended to reflect the inappropriateness of the application of a sequential assessment for new office floorspace.

**Council
Response:**

The Council considers it has incorporated sufficient flexibility within its approach to safeguarding employment land, consideration of such land for other uses in terms of development viability, and also in its approach to determining the appropriate location for new office development. The Council does not consider that soundness or legal compliance issues have been raised to merit changes to Policy CS4.

Spatial Strategy

Support

WR - Written Representation

170

**Summary of
Main Issues**

Support for the recognition that Knowsley's economy is inextricably linked to that of the wider Liverpool City Region and in turn the need to plan proactively to meet the development needs of businesses.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Welcomed.

**Summary of
Main Issues**

- Support in principle the acknowledgement of the need to look at cross boundary links in respect of jobs, employment opportunities, and the need to plan proactively to meet the development needs of business and to support the economy.
- Object to the way that employment policies deal with cross boundary issues which results in a need to release land within the Green Belt to address the shortfall of employment land - there is available and suitable land located on the immediate edge of Kirkby (a sub regional location for employment) which is outside of the Green Belt, immediately adjoining Simonswood Industrial Estate, to address the shortfall in employment land to address the identified shortfall in either or both West Lancashire and Knowsley.
- The Technical Report: Planning for Employment Growth (TR02) wrongly concludes that there are no such opportunities.
- The Core Strategy statement on duty to co-operate does not satisfactorily address this issue and the position is inconsistent with the NPPF and therefore unsound.
- Similar representations have been made to the West Lancashire Core Strategy (appended to representation).

**Summary of
Suggested
Changes**

- Request that the opportunity for employment land at Simonswood is reflected in modifications to the Core Strategy.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03) and Technical Report: Planning for Employment Growth (TR02) relating to employment requirements, as supported by evidence in the Green Belt Study (EB08), Joint Employment Land and Premises Study (EB07) and Overview Study (LC03 & LC03a). In this regard, no requirement has been identified for West Lancashire to accommodate any of Knowsley's future employment land needs, which will be entirely met within Knowsley. Furthermore, it is considered that the Simonswood Industrial Estate site is poorly located (in terms of access to the strategic road network) compared to other opportunities in Knowsley and the expansion as proposed in the representations could therefore be viewed as unnecessary and (despite the relatively poor accessibility of the site) having the potential to divert investment from Knowsley Industrial and Business Parks. As a consequence, the Council does not consider that the suggested change is necessary or appropriate.

17/1017.8/ 5.34 CS4

Mr Edward Bean

Plan
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Spatial Strategy

Support

WR - Written Representation

179

**Summary of
Main Issues**

Support for the statement that it is crucial to ensure an adequate choice of sites for developers by size, location and type.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Welcomed.

4/1004.2/ CS5

Alex Naughton

Merseytravel

Plan
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Spatial Strategy

Support with Amends

WR - Written Representation

183

**Summary of
Main Issues**

- Where development takes place in the Green Belt, this should only occur where good public transport and access by other sustainable modes exist, or can be achieved.
- If such development requires new public transport or other infrastructure, the cost of this should be borne by the developer.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider that these general comments have been addressed in the Plan, in particular Policies CS5, CS7 and CS27.

Spatial Strategy

Objection

AE - Attending Examination

183

**Summary of
Main Issues**

Objection to the removal of land from the Green Belt for the purposes of providing housing and employment land, due to:

- It would undermine the aims and objectives of the Green Belt, including countering the purposes of the Green Belt set out in national policy, and problems for sustainability, the farming sector, wildlife and biodiversity.
- Extension of the urban edge may: increase / extend problems of trespass, vandalism and interference with operations on remaining farmland; place additional pressure on farmers to remove features such as ponds and trees, which would result in biodiversity loss; increase pest species.
- Land proposed for removal supports scarce and declining wildlife.
- It would reduce public confidence in the planning system, as there is so much existing capacity in the urban areas of Merseyside.
- It does not make sense to be developing Green Belt land when there are vacant properties, vacant sites and underused sites in neighbouring Liverpool.
- Increased traffic on roads and lanes in the areas will decrease attractiveness of the areas for walkers, horse riders and cyclists.
- The removal of land from the Green Belt will ensure that opposite of NPPF objectives for Green Belt is achieved.
- The potential to undermine urban regeneration objection aims in Knowsley and in neighbouring authority areas.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness and legal compliance issues raised. The Council is satisfied that its approach to Green Belts is sound and justified by evidence, and is compliant with national policy.

Spatial Strategy

Objection

AE - Attending Examination

183

**Summary of
Main Issues**

- Unsound and illegal as it is not in accordance with national policy – Green Belt can only be released in exceptional circumstances.
- One or more of the tests are still valid and not met by the plan, including preservation of openness.
- Reference made to the presumption against inappropriate development in the Green Belt with reference to the NPPF.
- It is not justified to build on Green Belt as the housing study is not based on up to date and reliable evidence.
- Assumptions made in the SHMA, SHLAA and JELPS are queried
- The land is not needed as the figures were based on a buoyant economy which is not the case now due to the recent recession and lack of demand
- Could surplus employment land be used for housing?
- Could higher density be used so less land is required? Finance is not available (mortgage availability) limiting demand not the lack of available and deliverable sites.

**Summary of
Suggested
Changes**

- Detailed wording additions suggested in terms of Green Belt protection and protection of openness of the Green Belt.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), Technical Report: Planning for Housing Growth (TR01) and Technical Report: Planning for Employment Growth (TR02) relating to housing and employment requirements, as supported by evidence in the Green Belt Study (EB08), Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04), Joint Employment Land & Premises Study (EB07) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested changes are necessary.

**Summary of
Main Issues**

- In addition to broad locations identified for residential development in the Green Belt, several suitable site options could come forward in addition. This includes further “safeguarded” land options to ensure that benefits derived from Green Belt review are maximised in the longer term.

- Support for the proactive decision to review the Green Belt boundary, due to shortfall in supply of housing as evidenced in the SHLAA (EB01).

**Summary of
Suggested
Changes**

- Further housing land options, including identifying further safeguarded land within the Green Belt, for future residential development should be identified.

**Council
Response:**

The Council considers is approach to Green Belt release is sound. Sufficient land options for the Local Plan period have been identified through policy, including additional sites providing longer term flexibility.

**Summary of
Main Issues**

Support utilisation of Green Belt land to satisfy future development needs

Object to the removal of the “tiering” of broad locations for review of Green Belt boundaries, which will add to potential delay and resultant under-delivery. Some parcels of Green Belt land (including land owned by Maro at South Whiston) are suitable for earlier release due to:

- Their self contained nature with natural boundaries
- Their ability to capitalise on existing infrastructure including potential highways access / works
- The role in ensuring that accessible parts of larger Green Belt locations can be developed first
- Their role in allowing any early plan years’ under supply against housing targets to be met, due to their comparatively smaller scale
- The need to undertake time consuming and technically demanding master planning to facilitate release of larger sites

**Summary of
Suggested
Changes**

Tiering approach should be included in Policy CS5.

**Council
Response:**

The Council considers its approach to the phasing of review and release of Green Belt locations is justified by evidence within the Green Belt Study (EB08) and Technical Report: Green Belt (TR03).

**Summary of
Main Issues**

Land to the South of Whiston in Maro's ownership should be released in advance of the remaining Green belt land within the broad location. This is because:

- The land is well contained and can be developed in isolation
- Transport feasibility evidence shows access to the location can be gained through works to Windy Arbor Road
- Development of the site could facilitate the provision of the Sustrans cycleway between Whiston and Cronton

Support for the removal of the former Cronton Colliery land from the Green Belt, and the Land Trust's proposals for a Country Park. Sensible commercial development, which accounts for design access and environmental protections, can assist in gap funding to deliver the Country Park. The timing of removal should be related to market and end user demand.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council is content that its approach to phasing of the review and release of Green Belt locations, including the land at South Whiston, is justified by evidence including the Green Belt Study (EB08) and the Technical Report: Green Belt (TR03).

14/1014.6/ CS5 / S 2

Jackie Copley

Lancashire Branch of the CPRE

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Spatial Strategy

Objection

WR - Written Representation

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**Summary of
Main Issues**

- Objection to release of Green Belt land for development as this is not justified at this time. If the need is fully justified in the future, Green Belt release may be required, and CPRE request to be fully consulted.
- Planned extensions to the urban area are preferred to ad hoc developments on rural sites in response to the Government's newly introduced 5 year rule.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council considers that its approach to Policy CS5 and the case for release of Green Belt land for development is justified through the evidence base, including the Technical Report: Planning for Housing Growth (TR01) and Planning for Employment Growth (TR02). Given this justification, the Council considers that it has adopted a proactive approach to planned extensions.

17/1017.9/ CS5

Mr Edward Bean

Plan
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Spatial Strategy

Support with Amends

WR - Written Representation

183

**Summary of
Main Issues**

Support for Policy CS5, aside from the exclusion of the site at Shrog's Farm.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Noted.

85/1085.1/ CS5 / LC

(Executors) Mr R F Hesketh

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Spatial Strategy

Support

WR - Written Representation

183

Summary of Main Issues - Support for the clear need to review the Green Belt boundary to provide additional land to meet the identified shortfall of housing availability over the Local Plan period.

Summary of Suggested Changes n/a

Council Response: Noted and welcomed.

93/1093.4/ CS5 / S 1 2 4 / LC

Mr John Beesley

Beesley and Fildes Ltd / James Whittaker Associate

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Spatial Strategy

Objection

AE - Attending Examination

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Summary of Main Issues - As owners of Site Area (5) support the approach of releasing strategic land parcels from the Green Belt in furtherance of wider strategy housing policy and other objectives particularly the area priorities for Prescot (Para. 6.45)
- Confirm that the owners can make the land available and are in discussions with potential house builders regarding an early planning application to bring forward housing development at the earliest opportunity.
- Wholly support submissions of Redrow and Cass Associates in relation to Policy CS5 being unsound.

Summary of Suggested Changes n/a

Council Response: The Council supports its policy approach as sound and legally compliant, with explanation and justification for the triggers and timing of Green Belt release within the Technical Report: Green Belt (TR03).

Spatial Strategy

Objection

WR - Written Representation

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**Summary of
Main Issues**

Support for progression and houses being built if they are needed, but objection to the principle of Green Belt review. This is due to:

- there is no justification when there are vacant houses and other brownfield sites available
- the Council is grossly overestimating the amount of new houses that are actually required, the figures are out of date
- the approach actively encourages developers to seek out Green Belt land which is less expensive to develop
- Green Belt decommissioning should only be allowed in exceptional circumstances

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The justification for review of Green Belt for accommodation of new residential development has been considered in detail through the Council's evidence base, including the Technical Report: Planning for Housing Growth (TR01) and the Green Belt Study (TR03). The availability of other sources of housing land has been comprehensively reviewed through the Strategic Housing Land Availability Assessment (EB01) process.

Spatial Strategy

Support

WR - Written Representation

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**Summary of
Main Issues**

Note that Knowsley have used the joint Green Belt Study undertaken with Sefton to identify suitable sites in the Green Belt for development. Note that this is unlikely to have an adverse impact on Sefton.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Noted.

68/1068.5/ CS5

Mr John Woollam

Plan
Order.ID

Spatial Strategy

Support with Amends

WR - Written Representation

183

**Summary of
Main Issues**

In general, support Green Belt protection but accept that some areas may have to be taken to achieve the required housing targets.

**Summary of
Suggested
Changes**

**Council
Response:**

Noted. Consider no soundness or legal compliance issues raised.

69/1069.1/ CS5

Mr J R Harrison

West Lancashire Borough Council

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Spatial Strategy

Support

WR - Written Representation

183

**Summary of
Main Issues**

- Recognition of Knowsley's approach to Green Belt release which only seeks to release Green Belt land to meet needs within the Local Plan period (up to 2028).
- This reflects the need for a strategic Green Belt review in the wider Liverpool City Region to inform the most appropriate locations in the City Region for future Green Belt release.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Noted and welcomed.

**Summary of
Main Issues**

- Support for the identification of 'Land bounded by A58, Prescott (housing)' in CS5 para 5.50 as the site is available, suitable and achievable for housing development and there are no known constraints to its delivery.
- Not positively prepared, as stated in representations on Policies CS1, CS2 and CS3 the Core Strategy is unsound and it cannot deliver on the required housing provision and bring about transformational change in housing stock that is identified as required to enable sustainable development and growth to meet immediate and longer term needs. As such there will be a requirement for selected urban extensions within the Green Belt to come forward earlier in the plan period.
- Not justified as it is not founded on a robust and credible evidence base.
- Not consistent with the NPPF as it does not comply with the core planning principles in NPPF Para. 17. Although the Core Strategy has identified the needs for housing development it has not responded to meeting those needs or the wider opportunities for growth.
- Not consistent with the NPPF as it does not comply with NPPF Para. 47. The identified housing supply, particularly within the first five years, does not provide a realistic prospect of achieving the housing supply and ensuring a choice and competition in the market of land.

**Summary of
Suggested
Changes**

- Amended CS5 2. – Suggested replacement of 'meet longer term development needs' with 'ensure the delivery of housing and employment development over the plan period'.
- Replacement CS5 3 (a) - 'In the case of locations proposed for housing, permission will only be granted when it is necessary to maintain the required 'deliverable' supply of housing sites in accordance with Policy CS1 'Spatial Strategy for Knowsley' and Policy CS3 'Housing Supply, Delivery and Distribution'.
- Replacement of CS5 3 (b) with existing CS5 3 (d)
- Replacement of CS5 3 (c) with existing CS5 3 (b) with tests to show how this is to be demonstrated.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03) and Technical Report: Planning for Housing Growth (TR01), as supported by evidence in the Green Belt Study (EB08), Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate.

Spatial Strategy

Objection

AE - Attending Examination

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**Summary of
Main Issues**

Support for the principle of release of land from the Green Belt for housing and employment uses.

Concerns with the wording of Policy CS5, including:

- the phasing and release mechanism is not in accordance with the NPPF (paragraph 47), as it should take further account of the need to ensure that housing sites should be deliverable and developable
- the phasing and release mechanism does not address the priority of delivery of housing to meet needs and to balance the housing market in the Borough.
- the deliverability of the SHLAA sites within regeneration areas is questioned. This seems ambitious and a high proportion of the housing requirement. Issues within regeneration areas and associated with brownfield sites may deter investment and affect viability.
- Past completions and extant permissions in Halewood are low and hence the delivery of further housing in this area is questioned
- Prescott, Whiston, Cronton and Knowsley Village area has a high number of past completions but no existing allocations, and therefore could deliver more housing in the short term
- the SHLAA sites and Principal Regeneration Area sites are questioned in terms of whether they will ensure a balanced supply of housing land over the first ten years of the plan, including the potential for high density development on brownfield sites which would not provide a sufficient quantity and mix of high quality housing
- a site-specific case for timed release of the land at a given date when urban capacity is most likely to be exhausted is suggested, which would provide a wide choice of market and affordable housing distributed across the Borough

**Summary of
Suggested
Changes**

Policy CS5 should be amended to including reference to a site specific phasing release of land to ensure that a five year supply of deliverable sites is maintained at all times.

**Council
Response:**

The Council's approach to phasing of potential release of reserved Green Belt locations is justified through the Council's evidence base. The approach is compliant with national policy, as demonstrated in the Green Belt Study (EB08) and Technical Report: Green Belt (TR03). The Council is content that its approach is reflective of the wider objectives of the Plan, including a focus on urban regeneration and brownfield development.

**Summary of
Main Issues**

Support for the Land South of Whiston (Location 8) being shown as a reserved location for Green Belt release prior to 2028.

Paragraph 3 should make reference to NPPF paragraph 49, which places delivery of housing land supply as the key priority when housing supply drops below 5 years. The NPPF says nothing about balancing and countering this with other planning objectives. In these circumstances identified Green Belt sites should be approved should be approved, and should not be phased, sequentially assessed or impact tested against other sites.

**Summary of
Suggested
Changes**

Amendments to Policy CS5:

- Parts 3a and 3b should be deleted
- should contain more positive narrative regarding the benefits of Green Belt release to correct housing shortfalls, maximise supply and improve affordability
- Part 3c should avoid the suggestion that Green Belt sites will only be released to top up the five year supply
- should reflect NPPF approach that policies and decisions should ensure choice and competition in the market for land
- achieving an additional buffer of 20% on housing land supply should be the aim, based on past and current under delivery

**Council
Response:**

The Council considers that the approach demonstrated in Policy CS5 is sound, compliant with national policy and meets the wider objectives of the plan. The approach is informed by evidence including Technical Reports and the Green Belt study (EB08). The phasing mechanism within Policy CS5 is fully justified, and is aimed at protecting urban regeneration priorities while balancing the housing market in the longer term. It is also fully compliant with the NPPF and the requisite buffer on housing land supply, see footnote 83 and the Council's Strategic Housing Land Availability Assessment (EB01).

Spatial Strategy

Objection

AE - Attending Examination

183

Summary of Main Issues Objection to the proposed abuse of Green Belt planning laws.

Summary of Suggested Changes n/a

Council Response: Noted.

Spatial Strategy

Objection

AE - Attending Examination

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**Summary of
Main Issues**

- Green Belt release and urban sprawl,
- Concerns raised in terms of pressure on infrastructure such as schools, transport, health services and welfare.
- Concerns over the expense of absorbing the number of houses proposed which is unacceptable to the public and unsustainable for the Borough.
- Local communities should decide the areas to be protected.
- Loss of agricultural land.
- Incremental loss of Green Belt land historically (1095A, 1095B and 1095C).
- Impact upon wildlife.
- Suspicion that the Green Belt policies are a synergy by Councils to the National Planning Policy Framework to re-designate them to meet housing demand.
- Availability of brownfield sites which could be developed and allocated to housing development.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03) and Technical Report: Planning for Housing Growth (TR01) relating to housing requirements, as supported by evidence in the Green Belt Study (EB08), Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04) and Economic Viability Assessment (EB06).

**Summary of
Main Issues**

- Acknowledgement that Knowsley have reflected Liverpool's concern that the timing of Green Belt release should not undermine regeneration in the wider sub-region, as well as in Knowsley itself.
- Further acknowledgement that the evidential basis (SHLAA, JELPS, Overview Study) is sufficiently robust to support the approach to be adopted.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council supports its policy approach as sound and legally compliant and therefore welcomes this comment.

Spatial Strategy

Objection

AE - Attending Examination

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**Summary of
Main Issues**

- Broadly support the Council's approach in Policy CS5 towards the future of the Green Belt
- Strong supported release of Green Belt land and the identification of reserve and safeguarded location to meet future housing needs in accordance with NPPF (S52 and S85).
- Object to the indication that planning permission will only be granted for residential development where it is necessary for the Council to maintain a five year deliverable supply given the heavy reliance of release of Green Belt sites to meet its housing requirements
- Object to the proposal to defer a review of Green Belt boundaries until such a time as the Site Allocations and Development Policies stage is prepared despite an acute shortage of suitable urban sites in certain parts of the Borough, such strategic alterations should be identified in the Core Strategy and the policy therefore does not provide an effective mechanism for the release of reserved locations if regeneration fails to deliver within anticipated timescales
- Support the identification of reserved locations at Para. 5.50, however it is requested that they are included within the text of Policy CS5 and plans of strategic alterations to the Green Belt boundary are included in the Core Strategy to ensure delivery of the sites through the trigger mechanism
- The policy is also not justified as it does not explain why it considers the immediate release of Green Belt land in Halewood (Location 7) may harm the delivery of regeneration programmes in Principal Regeneration Areas and that the site can only come forward in accordance with identified trigger mechanisms
- Policy CS5 does not reflect the immediate need to release Green Belt land in Halewood (Location 7) in order to meet short term housing needs

**Summary of
Suggested
Changes**

- List all "reserve" locations in wording of Policy CS5
- Identify strategic alterations to the Green Belt boundary within the Core Strategy, and amend CS5 (6), and supporting paragraphs accordingly
- Reduce the triggers for bringing forward the identified Halewood reserved locations (Location 7), in line with the identified existing and future housing need
- In the event that the Council does not identify strategic Green Belt alterations in the Core Strategy, allocate land 'East of Halewood' (Location 7) for immediate housing development in the emerging Local Plan Site Allocations and Development Policies.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), Technical Report: Planning for Housing Growth (TR01) relating to housing requirements, as supported by evidence in the Green Belt Study (EB08), Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate.

Spatial Strategy

Objection

AE - Attending Examination

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**Summary of
Main Issues**

- Not positively prepared as it would not provide adequate development land to meet the needs of the area
- Not properly justified by evidence and is not the most appropriate strategy.
- Not effective as it is not totally deliverable.
- Not consistent with national policy.
- Support for the proposal by the Council to release Green Belt land as there is no other sensible alternative. However, it is considered that the Council have underestimated development requirements.
- Support for the identification of safeguarded land for development beyond the plan period.
- It is considered that CS5 should be clear that broad locations will be required for development in the plan period.
- It is considered planning permission would need to be granted for sites within the Green Belt before 2016/17 (or potentially due to concerns regarding the SHLAA) in order to deliver completions by 2018/19 in order to maintain a five year supply
- It is considered that CS5 should, list strategic allocations, identify as "broad locations" other areas of land to be excluded from the Green Belt, list the broad locations to be developed in the plan period and for what purpose(s), state that the Allocations DPD will define new Green Belt boundaries and make clear that any phasing of the broad locations will be determined by the site allocations DPD.
- There are significant needs for development in Knowsley which the evidence base shows cannot be met without Green Belt release. The resultant unmet needs can constitute exceptional circumstances to justify Green Belt release.
- Comprehensive, master planned development (north and south of the M62) could deliver new facilities and infrastructure, a sustainable transport network and greenspace.
- CS5 requires the release of the sites north and south of the M62 to wait until the adoption of the Site Allocations DPD and the phasing requirements of the policy are satisfied. As a result opportunities for sustainable development may be lost.
- It is considered that the sites north and south of the M62 should be identified as strategic allocations in the Core Strategy to meet shortfalls in deliverable housing and employment land.
- Release of the sites north and south of the M62 would not impact on Principal Regeneration Areas as they would cater for different market sectors.
- The designation of the sites north and south of the M62 would accord with national guidance on such types of allocations (as set out in the CLG Plan-Making Manual) because: they are critical to the delivery of the plan; defining boundaries now would allow the sites to make an early contribution to development requirements; and there is sufficient evidence to demonstrate the proposed development is viable.

**Summary of
Suggested
Changes**

- List the sites which will be strategic allocations of the Core Strategy.
- Identify as Broad Locations other areas of land to be excluded from the Green Belt.
- List the Broad Location(s) which are to be developed in the plan period and for what purposes.
- List the other Broad Location(s) as areas for longer term development beyond the plan period (safeguarded land)
- State that the Allocations DPD will define the detailed boundaries of the Broad Locations, including consequential amendments to the Green Belt and development allocations.
- Make clear that any phasing of the Broad Locations will be determined by the Allocations DPD. Such phasing should take account of the relative sustainability of locations, including the contribution to Borough-wide planning objectives, and the need to

maintain a continuing supply of deliverable housing and employment land.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), Technical Report: Planning for Housing Growth (TR01) and Technical Report: Planning for Employment Growth (TR02) relating to housing and employment requirements, as supported by evidence in the Green Belt Study (EB08), Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04), Joint Employment Land & Premises Study (EB07) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested changes are necessary, noting that Policy CS5 ensures sufficient flexibility for appropriate Green Belt release to deliver the required development during the plan period and beyond.

Spatial Strategy

Objection

AE - Attending Examination

183

**Summary of
Main Issues**

- There is a lot wrong with the Council's approach to the Green Belt.
- Considerable concerns exist about the general approach as well as the detailed methodology that has been used.
- In addition there are grave concerns in how the sustainability appraisal has been used to justify the sites.
- The process is not even presented as one of selecting suitable locations for development, but of carrying out a Green Belt review, and so elevating the maintenance of Green Belt above the establishment of the most suitable strategy (and in core strategy terms, the most appropriate strategy).
- The methodology used is at odds with established good practice and more particularly with national planning policy. The plan uses a simplistic test to consider how development would fit with the purposes of including land within the Green Belt and the consequence is to undermine the achievement of the most sustainable strategy using the most appropriate development locations.
- The Council's methodology effectively discounts land for development solely on an interpretation of Green Belt purposes, and we believe an incorrect interpretation at that - consequently either policies SD1, CS1 and CS2 are unsound because they fail to accurately reflect the evidence about the areas and consequently do not set a sufficiently spatial strategy, or the strategy is unsound because it is not a product of these policies.
- The Green Belt policy test has been misapplied in specific locations at Halewood.
- All of the purposes of including the land in the Green Belt should be considered in an objective comparative exercise. The review has relied far too much on whether development would reduce the width of a 'gap' - whether or not this is a gap between neighbouring towns - and not enough on understanding the contribution of land to the setting and identity of settlements.
- Another concern is wholly inadequate approach taken to ensuring that Green Belt boundaries endure beyond the plan period through the identification of safeguarded land.
- There is no explanation of the Council's thinking of how much development would be likely during the next plan period and hence - if this is to be mainly met from land currently within the Green Belt - how much land needs to be safeguarded in the plan to avoid changes to the Green Belt at the end of, or indeed within, this plan period.
- The policy and the reserved sites listed at paragraph 5.50 are unsound because the identification of development locations is based on an incorrect process.
- This approach does not deliver the sites required to meet the objectively assessed needs of the Borough and townships, and it does not produce the most sustainable strategy.
- Providing for sites which are currently in the Green Belt to be released according to five year reviews basically contradicts the thrust of national policy in requiring Green Belt to be planned properly so that it can endure. This means that what is developed in this plan period has to be removed from Green Belt by this plan at its adoption, and what is likely to be required in the next plan period, or even into the one after that, has to be redesignated as safeguarded land in this plan.

See General Statement for further detailed comments.

**Summary of
Suggested
Changes**

- The policy should be rewritten based on a spatial strategy which considers the needs of the Borough and townships and sets out the most appropriate locations for development. Only then should a proper review of the green belt locations be undertaken. If this was done the policy would be different and different sites would be identified.

- Where the development is required according to the objective assessment of need, the promotion of sustainable patterns of development should prevail and there should be appropriate and intelligent redrawing of the Green Belt.
- The land promoted through these representations (Land at Lydiate Lane, Halewood) should be made available in this plan period to provide greater flexibility in the strategy, as well as to increase the amount of housing that can be delivered in the early stages of the plan and for the plan period as a whole.

See General Statement for further detailed comments.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), Technical Report: Planning for Housing Growth (TR01) and Technical Report: Planning for Employment Growth (TR02) relating to housing and employment requirements, as supported by evidence in the Green Belt Study (EB08), Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04), Joint Employment Land & Premises Study (EB07) and Economic Viability Assessment (EB06).

**Summary of
Main Issues**

- Concern that the effectiveness of the Core Strategy is undermined by the general approach to the phased release of 'reserved' locations, there needs to be recognition in Policy CS5 that the early redevelopment of Green Belt sites will support strategic regeneration objectives (particularly Strategic Objective 3) and the overriding NPPF objective of sustainable development
- Priority should be given to land in urban area and also reserved Green Belt locations which are Previously Developed Land and contribute to regeneration in Principal Regeneration Areas
- Welcome the inclusion of land at Carr Lane (Location 3) as a 'reserved' location to be removed from the Green Belt and support for the identification of this land as suitable for either housing or employment use
- Carr Lane (Location 3) is contiguous with the South Prescot Principal Regeneration Area and effective delivery of regenerative development at South Prescot is best served by the early release of land at Carr Lane
- There are no significant impediments to developing the Carr Lane site (Location 3), it has independent access and is in single ownership

**Summary of
Suggested
Changes**

- Amend Policy CS5 Part (2) - delete 'longer term'
- Amend Policy CS5 Part (3) (a) - add 'together with those 'reserve sites' in the Green Belt that are both previously developed land and will make a significant contribution to the delivery of development within a Principal Regeneration Area'.
- Replacement Policy CS5 Part (3) (c) - 'With the exception of 'reserve sites' which meet the criteria in 3(a) above, in the case of locations proposed for housing, permission will only be granted when this is necessary to maintain a five-year 'deliverable' supply of housing sites in accordance with Policy CS3 'Housing Supply, Delivery and Distribution'.
- Replacement Policy CS5 Part (3) (d) - 'With the exemption of 'reserved sites' which meet the criteria in 3(a) above, in the case of locations proposed for employment, permission will only be granted when this is necessary to maintain a range of sites, including a five year deliverable supply in accordance with Policy CS4 Economy and Employment'.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), Technical Report: Planning for Housing Growth (TR01) and Technical Report: Planning for Employment Growth (TR02) relating to housing and employment requirements, as supported by evidence in the Green Belt Study (EB08), Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04), Joint Employment Land & Premises Study (EB07) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate.

**Summary of
Main Issues**

- The Strategy does not provide clear reasoning due to flaws in the evidence base on a number of key points relating to the departure from national policy regarding the removal of land from the Green Belt which should occur only in exceptional circumstances.

**Summary of
Suggested
Changes**

- Errors in the evidence base should be corrected.
- Re-consultation with KGBS4 (or part of it) in Kirkby included as an alternative employment use site, and KGBS6 could provide an alternative site for housing.
- The country park site at Land south of M62 / Cronton Colliery (parcels K057 and K058 in the Green Belt Study) should remain in the Green Belt and be removed from Strategy proposals.
- Land to the South of Whiston (KGBS14) should be reconsidered again and as separate parcels (K045, K048, K052 and K053).

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt, Technical Report: Planning for Housing Growth (TR01) and Technical Report: Planning for Employment Growth (TR02) relating to housing and employment requirements, as supported by evidence in the Green Belt Study (EB08), Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04), Joint Employment Land & Premises Study (EB07) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate.

**Summary of
Main Issues**

- Small scale development on a greater number of Green Belt locations may be preferable.

**Summary of
Suggested
Changes**

- To release smaller sections in more areas of the Green Belt for residential development to assist with housing requirements.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03) and Technical Report: Planning for Housing Growth (TR01) relating to housing requirements, as supported by evidence in the Green Belt Study (EB08), Strategic Housing Land Availability Assessment (EB01) and Strategic Housing Market Assessment (EB04). As a consequence, the Council does not consider that the suggested change is necessary or appropriate.

**Summary of
Main Issues**

- The proposed phasing policy giving first priority to development of land in the urban area and associated phasing delays delivery of housing to meet identified needs is flawed. The policy as currently drafted is not effective and hinders the development of sites such as Bank Lane, Kirkby, preventing the LPA from meeting its identified and recognising housing land delivery requirements, due to the criterion of Part 3 of Policy CS5.
- As informed by Counsel advice, the first criterion of Part 3 relating to development of land within the urban area is at best unnecessary and at worst self defeating.
- The policy is inconsistent with NPPF Paras 14, 15, 17, Section 6 (Paras 47 -50 in particular), 83, 84, 85, 158 and 159 as it will not enable delivery of sustainable development in the Borough via the 'golden thread' of the NPPF – the presumption in favour of sustainable development. The current phasing policy will not allow the local plan to meet the development needs of the area in the required time period.
- Whilst the Local Plan identifies a number of areas to be removed from the Green Belt to meet future housing needs, the policy and supporting text does not specifically remove these areas and instead defers the decision on such boundary changes to a subsequent document. By deferring such decisions, delivery of sustainable sites such as Bank Lane, Kirkby will be unnecessarily delayed.

**Summary of
Suggested
Changes**

- Delete Part 3 (a) - restrictive phasing mechanisms should be amended to bring forward early release of reserved locations including Bank Lane within the 0-5 year period, if it can be demonstrated that they will assist in delivery of a re-balanced housing portfolio which the SHLAA (EB01) and Local Plan itself seek to provide.
- Remove Bank Lane, Kirkby site from the Green Belt as part of the current Local Plan process and not deferring it to a future Development Plan Document (date unspecified).

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), as supported by evidence in the Green Belt Study (EB08). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate.

**Summary of
Main Issues**

- The ability of the Council to alter Green Belt boundaries to meet objectively assessed needs is in accordance with NPPF
- Support for listing of locations at Para. 5.50 but should be in main policy text
- Support that two-tier approach has been removed
- Definition of major existing developed sites is not consistent with the NPPF
- Object to the proposed use of the Local Plan: Site Allocations and Development Management to formally redraw the boundaries of the Green Belt and encourage the release of the reserved sites for development through this document - clear evidence of under-provision of new housing required to be addressed through release of housing sites now rather than in late 2014 at the earliest
- Benefits of earlier Green Belt release would also include: economic boosts to the housing and construction sectors, redressing imbalance of housing provision, retail and community facility impacts.

**Summary of
Suggested
Changes**

- Site locations should be specifically listed in Policy CS5 rather than Para 5.50
- Text should be altered to reflect that reserved sites are suitable, appropriate and deliverable development sites
- Release of sites through the Core Strategy.
- Remove reference to 'major existing developed sites' and replace with reference to redevelopment of previously developed site in the Green Belt that is NPPF compliant.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), as supported by evidence in the Green Belt Study (EB08). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate.

Spatial Strategy

Objection

AE - Attending Examination

183

Summary of Main Issues - In line with the NPPF any construction or building is deemed inappropriate in Green Belt and should not be approved except in very special circumstances.

Summary of Suggested Changes - Focus more on urban regeneration

Council Response: The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), Technical Report: Planning for Housing Growth (TR01) and Technical Report: Planning for Employment Growth (TR02), as supported by evidence in the Green Belt Study (EB08), Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04), Joint Employment Land and Premises Study (EB07) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested change is achievable given the policy has already sort to prioritise deliverable urban regeneration opportunities first before Green Belt release required to meet longer term development needs that cannot be accommodated in the urban area.

Spatial Strategy

Objection

WR - Written Representation

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**Summary of
Main Issues**

There is no specific consideration of the development strategy of Liverpool City Council. No joint Green Belt study has been carried out with Liverpool as for Sefton and West Lancashire. The plan is therefore unsound as to be effective it must be delivered in coherence with the strategies of neighbouring authorities.

**Summary of
Suggested
Changes**

The Core Strategy should address the Liverpool City Council strategy for Green Belt and development of land identified in paragraph 5.50 that lies within these boundaries including a joint review of plans to 2028.

**Council
Response:**

The Council considers that it has co-operated with Liverpool City Council at all stages of plan preparation, and has consulted them in their capacity as a specific consultee. This is demonstrated in the Duty to Cooperate Statement (SD14) and in the Statement of Previous Consultation (SD03).

Spatial Strategy

Objection

AE - Attending Examination

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**Summary of
Main Issues**

- Section 5.43 states there are adequate development areas in Liverpool City Region, yet Knowsley is proposing to move the Green Belt boundary to make even more land available - this is not necessary according to the LCR Housing and Economic Development and the Overview Study.
- Knowsley should not have to give up agricultural land (Green Belt) for development while there is still agriculturally less valuable land available within a commutable distance.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt, as supported by evidence in the Green Belt Study.

Spatial Strategy

Objection

WR - Written Representation

191

Summary of Main Issues The approach to Green Belt is not justified against the reasonable alternatives of addressing under occupancy in existing housing stock, and consideration of the use of empty housing stock.

Summary of Suggested Changes n/a

Council Response: The Council has clearly considered a range of alternatives for meeting development needs before considering Green Belt review. This is demonstrated through previous consultation stages, as well as through evidence base documents such as the Technical Report: Planning for Housing Growth (TR01) and through supporting assessments including the Sustainability Appraisal.

Spatial Strategy

Objection

AE - Attending Examination

192

Summary of Main Issues - For several years the Council has been legally engaged with a property owner near to the land proposed for Green Belt release at KGBS17 (Land South of M62) over who built his property without planning consent despite knowledge that land just 50m away is due to be reclassified. This undermines the legal position and moral standing of the Council.

Summary of Suggested Changes - KGBS17 to be retained in the Green Belt.

Council Response: The Council supports its policy approach as sound and legally compliant, with appropriate explanation and justification within the Technical Report: Green Belt, as supported by evidence in the Green Belt Study. In this regard, comments relating to the specific circumstances, consideration and action taken with regard to an un-authorized development has no reasonable relationship to strategic policy approaches progressed through an emerging Local Plan.

Spatial Strategy

Objection

WR - Written Representation

193

**Summary of
Main Issues**

Question whether a detailed boundary review has been undertaken with Liverpool City Council for proposed Green Belt sites that meet adjacent authority boundaries.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council considers that it has co-operated with Liverpool City Council at all stages of plan preparation, and has consulted them in their capacity as a specific consultee. This is demonstrated in the Duty to Cooperate Statement and in the Statement of Previous Consultation.

**Summary of
Main Issues**

Objection to the reservation of Green Belt at South Whiston (location 8) for new residential development, due to:

- severe disruption to traffic congestion
- there will not be enough schools, shops, doctors, dentists, hospitals, emergency services and other services
- access to the site is inadequate
- requirement for a supermarket and ancillary car park to support new residents
- existing congestion issues at Whiston Village due to Tesco
- requirement for a new school
- requirement for a new medical health centres
- there are plenty of other less congested places to build if required at all
- it would be more cost effective to use all the empty homes to home people, then find a more suitable location to build new homes
- there are few enough villages left in the UK

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base. The Council is comfortable that it has considered other options for new residential development, including the occupation of empty homes and the use of housing land in other parts of Knowsley.

**Summary of
Main Issues**

Objection to potential residential development on Green Belt land at South Whiston (location 8) due to:

- proposals will obliterate what is left of the Green Belt
- impact on quality of life of existing residents of Halsnead Park and their homes
- impacts on residents of the surrounding area, due to strain on local services
- there are large brownfield sites in Huyton, Whiston and Prescot which could be developed as an alternative
- there is social housing that is being improved in the area
- impact of ruining a natural and protected resource
- various political concerns

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

**Summary of
Main Issues**

Objection to potential residential development on Green Belt land at South Whiston (location 8) due to:

- proposals will obliterate what is left of the Green Belt
- impact on quality of life of existing residents of Halsnead Park and their homes
- impacts on residents of the surrounding area, due to strain on local services
- there are large brownfield sites in Huyton, Whiston and Prescot which could be developed as an alternative
- there is social housing that is being improved in the area
- impact of ruining a natural and protected resource
- various political concerns

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

Spatial Strategy

Objection

WR - Written Representation

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**Summary of
Main Issues**

Objection to potential residential development on Green Belt land at South Whiston (location 8) due to:

- proposals will obliterate what is left of the Green Belt
- impact on quality of life of existing residents of Halsnead Park and their homes
- impacts on residents of the surrounding area, due to strain on local services
- there are large brownfield sites in Huyton, Whiston and Prescot which could be developed as an alternative
- there is social housing that is being improved in the area
- impact of ruining a natural and protected resource
- various political concerns

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

Spatial Strategy

Objection

WR - Written Representation

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**Summary of
Main Issues**

Objection to the reservation of land at South Whiston (location 8) for new residential development, due to:

- impacts on traffic congestion, pollution, noise and pedestrian safety
- Whiston will be made less attractive and existing residents will probably move away
- impact upon Halsnead Caravan park and urban sprawl
- impact on the green environment
- there are empty houses and vacant industrial sites which could be used as alternative locations for residential development
- impact on ancient woodland, habitats and numerous species of wildlife
- impact on recreational opportunities including off road walks
- increased strain on local services including doctors, dentists and school places
- Whiston has little green space left

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

41/1041.1/ 5.50 CS5

Mr Frank Shuker

Plan
Order.ID

Spatial Strategy

Objection

WR - Written Representation

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**Summary of
Main Issues**

Objection to the potential reservation of Green Belt land at South Whiston (location 8) for new residential development due to:
- it would be a complete disaster
- the highway network is over capacity with the existing traffic

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

42/1042.1/ 5.50 CS5

Mr Robert Fairclough

Plan
Order.ID

Spatial Strategy

Objection

WR - Written Representation

197

**Summary of
Main Issues**

Opposition to the reservation of Green Belt land at South Whiston (location 8) for new residential development due to:
- traffic increasing congestion and pollution
- increased strain on doctors and hospital appointments
- increased strain on school places
- impacts on wildlife habitats
- local residents want to keep Green Belt for leisure and pleasure

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

Spatial Strategy

Objection

WR - Written Representation

197

**Summary of
Main Issues**

Objection to potential residential development on Green Belt land at South Whiston (location 8) due to:

- proposals will obliterate what is left of the Green Belt
- impact on quality of life of existing residents of Halsnead Park and their homes
- impacts on residents of the surrounding area, due to strain on local services
- there are large brownfield sites in Huyton, Whiston and Prescot which could be developed as an alternative
- there is social housing that is being improved in the area
- impact of ruining a natural and protected resource
- various political concerns

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

Spatial Strategy

Objection

WR - Written Representation

**Summary of
Main Issues**

Opposition to the reservation of Green Belt at South Whiston (location 8) for new residential development, due to:

- residents of Halsnead Park came to the area for retirement and to enjoy rural views, wildlife and peace
- impact on traffic, congestion and pollution
- impact on waiting times for doctors
- school overcrowding
- the option to build elsewhere

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

Spatial Strategy

Objection

WR - Written Representation

197

**Summary of
Main Issues**

Opposition to the reservation of Green Belt at South Whiston (location 8) for new residential development, due to:

- too much greenery has been taken away in the past
- the need to preserve scenery
- the need to protect wildlife
- impacts on traffic, congestion and noise
- impact on local school places
- existing residents deserve a portion of greenspace for recreation

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

Spatial Strategy

Objection

WR - Written Representation

197

**Summary of
Main Issues**

Opposition to the reservation of Green Belt at South Whiston (location 8) for new residential development, due to:

- impact on all residents of the Whiston area
- generation of high amounts of traffic, exacerbating existing congestion and road safety risks for cars and pedestrians
- impact on availability of school places and subsequent need to travel, affecting carbon footprints
- impact on waiting times for doctors and hospitals
- impact on the look of Whiston Village
- long term ecological impacts and costs

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

Spatial Strategy

Objection

AE - Attending Examination

197

**Summary of
Main Issues**

Concern regarding the potential development of land at South Whiston (Location 8) including:

- seasonal high water table in residential gardens, with building exacerbating flood risk
- the area directly behind Windy Arbor Close and between Halsnead Lakes is totally water logged

**Summary of
Suggested
Changes**

- The area behind Windy Arbor Close and Simons Close should be free of buildings or roads.

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

Spatial Strategy

Objection

WR - Written Representation

197

**Summary of
Main Issues**

Opposition to the reservation of Green Belt at South Whiston (location 8) for new residential development, due to:

- impact on the local environment and many areas
- the need for increased transport causing more congestion and pollution
- increased waiting times for doctor and hospital appointments
- impact on places in local schools and nurseries
- potential loss of playing fields on Windy Arbor Road
- impact on wildlife
- there is only a small amount of greenspace in the local area

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

Spatial Strategy

Objection

WR - Written Representation

197

**Summary of
Main Issues**

Opposition to the reservation of Green Belt at South Whiston (location 8) for new residential development, due to:

- existing residents moved to Halsnead Park due to the countryside and views
- impact of ruining the countryside and bringing many problems to the area
- increased traffic and pollution
- loss of countryside walks and wildlife
- local residents do not want houses built in the area

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

Spatial Strategy

Objection

WR - Written Representation

197

**Summary of
Main Issues**

Opposition to the reservation of Green Belt at South Whiston (location 8) for new residential development, due to:

- there is no need for more houses in this area
- the increase in traffic, pollution, crime, waiting times for doctors and dental appointments
- existing residents of Halsnead Park enjoy rural views and wildlife

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

Spatial Strategy

Objection

WR - Written Representation

197

**Summary of
Main Issues**

Opposition to the reservation of Green Belt at South Whiston (location 8) for new residential development, due to:

- residents of Halsnead Park have paid large amounts of money to live in a peaceful area
- the area already suffers from traffic to and from the motorway
- existing issues of congestion / street furniture damage in Whiston Village
- more homes would bring more people to the area and would impact on appointment waiting times for doctors and hospitals
- strong objection to the area being a concrete and brick jungle

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

Spatial Strategy

Objection

WR - Written Representation

197

**Summary of
Main Issues**

Objection to the reservation of Green Belt at South Whiston (location 8) for new residential development, due to:

- over previous years Councils having slowly eroded the Green Belt in Whiston
- the area having lost species of flora and fauna over many years
- the area not having a decent evening and weekend bus service
- a Centre for Learning in Prescot that is not fit for purpose
- little having been done to reverse the trend of pupils travelling out of Knowsley for education
- existing traffic congestion in Whiston Village needing to be alleviated
- many other factors which needing to be taken into consideration

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

51/1051.1/ 5.50 CS5

Mr G Jamieson

Plan
Order.ID

Spatial Strategy

Objection

WR - Written Representation

197

**Summary of
Main Issues**

Opposition to the reservation of Green Belt at South Whiston (location 8) for new residential development, due to:
- the countryside was the reason that existing residents moved to the area
- the existing peaceful and rural setting
- impact on wildlife

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

52/1052.1/ 5.50 CS5

Mr B Jolen

Plan
Order.ID

Spatial Strategy

Objection

WR - Written Representation

197

**Summary of
Main Issues**

Opposition to the reservation of Green Belt at South Whiston (location 8) for new residential development, due to:
- detrimental impacts on local amenities
- overcrowding
- loss of wildlife
- loss of Green Belt space
- fundamental negative impact on the whole area

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

Spatial Strategy

Objection

WR - Written Representation

197

**Summary of
Main Issues**

Objection to the reservation of Green Belt at South Whiston (location 8) for new residential development, due to:

- the local highway network was not built to accommodate the additional dwellings
- the local highway network is already dangerous for pedestrians
- additional vehicles would create more pollution, affecting the local environment and habitats
- inability of local schools to accommodate extra children
- the Green Belt is precious to the local community and the country as a whole
- the destruction of local habitat of birds and animals
- it would be criminal if this beautiful piece of land was destroyed.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base. Detailed highways design matters would be considered at a planning application stage.

Spatial Strategy

Objection

WR - Written Representation

197

**Summary of
Main Issues**

Opposition to the reservation of Green Belt at South Whiston (location 8) for new residential development, due to:
- impact on traffic congestion
- effects on wildlife
- prospect of children coming onto Halsnead Park

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

**Summary of
Main Issues**

Objection to potential residential development on Green Belt land at South Whiston (location 8) due to:

- proposals will obliterate what is left of the Green Belt
- impact on quality of life of existing residents of Halsnead Park and their homes
- impacts on residents of the surrounding area, due to strain on local services
- there are large brownfield sites in Huyton, Whiston and Prescot which could be developed as an alternative
- there is social housing that is being improved in the area
- impact of ruining a natural and protected resource
- various political concerns

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

Spatial Strategy

Objection

WR - Written Representation

197

**Summary of
Main Issues**

Opposition to the reservation of Green Belt at South Whiston (location 8) for new residential development, due to:

- unacceptable loss of public green space
- the Council should continue to respect the integrity of the UDP allocation, as the grounds that determined that this land should be protected have not changed
- the over-development of green space
- the scale of development would be such that there could not be an adequate means of mitigation or compensation for loss of open space.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

Spatial Strategy

Objection

WR - Written Representation

197

**Summary of
Main Issues**

Opposition to the reservation of Green Belt land at South Whiston (Location 8) for residential development due to the potential impact on:

- the highway network
- school capacity

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

Spatial Strategy

Objection

WR - Written Representation

197

**Summary of
Main Issues**

Opposition to the reservation of Green Belt at South Whiston (location 8) for new residential development, due to:

- unacceptable loss of public green space
- the Council should continue to respect the integrity of the UDP allocation, as the grounds that determined that this land should be protected have not changed
- the over-development of green space
- the scale of development would be such that there could not be an adequate means of mitigation or compensation for loss of open space.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

Spatial Strategy

Objection

WR - Written Representation

197

**Summary of
Main Issues**

Opposition to the reservation of Green Belt at South Whiston (location 8) for new residential development, due to:

- very few facilities in Whiston for existing residents
- no sixth form provision for younger people, youngsters have to travel to Cronton, Roby or St. Helens
- primary schools could not cope with increased numbers
- local Centre for Learning is full to capacity
- there are no leisure centres in the area, residents must travel to Knowsley Leisure and Culture Park but there is no bus service to the local area past 6pm
- there should be provision of leisure facilities rather than 1500 homes
- there must be brownfield sites available, which should be used instead

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

58/1058.1/ 5.50 CS5

Mr and Mrs K Wright

Plan
Order.ID

Spatial Strategy

Objection

WR - Written Representation

197

**Summary of
Main Issues**

Opposition to the reservation of Green Belt at South Whiston (location 8) for new residential development. Residents do not want 1500 houses built on this land.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised.

55/1055.1/ 5.50 CS5

Mr and Mrs Powell

Plan
Order.ID

Spatial Strategy

Objection

WR - Written Representation

197

**Summary of
Main Issues**

Opposition to the reservation of Green Belt at South Whiston (location 8) for new residential development, due to:

- loss of green and pleasant land
- loss of wildlife habitats
- increased traffic pollution and noise disturbance
- additional strain on already strained resources including schools, hospitals, doctors, dentists
- existing impact of encroachment of the motorway on the area
- questions around where new families will find sustainable work
- existing residents choose to live in the area due to the retention of countryside

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

Spatial Strategy

Objection

WR - Written Representation

197

**Summary of
Main Issues**

Opposition to the reservation of Green Belt at South Whiston (location 8) for new residential development, due to:

- 800 people have already signed a petition objecting to the proposals
- existing congestion and traffic issues on Windy Arbor Road
- flora and fauna have already suffered due to the motorway link road
- there are forward-looking impracticalities with the approach
- objection to the process which destroys a bare patch of greenery amidst a landscape of unnecessary and unwanted structures
- existing vandalism
- the impact of more houses and more people will bring chaos

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

Spatial Strategy

Objection

WR - Written Representation

197

**Summary of
Main Issues**

Opposition to the reservation of Green Belt at South Whiston (location 8) for new residential development, due to:

- the arrogance of the Council to think that building on Green Belt is acceptable
- the country and all of Knowsley is very short on green space
- the disruption caused to local residents
- the impact on the suffering of wildlife
- the impact on those who have moved to Halsnead Park to be surrounded by fields and woods
- the Council should listen to the community

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

Spatial Strategy

Objection

AE - Attending Examination

197

**Summary of
Main Issues**

- Agree with principle that Green Belt boundaries need to be reviewed to support housing land supply, and that land should be safeguarded but disagree with methodology used to score sites
- Agree broadly with the approach of safeguarding land around Knowsley Village to meet longer term development needs
- The Epicentre site has been discounted for consideration at an early stage without due and proper consideration. Disagree with the conclusions of the Technical Report: Green Belt regarding the proposed Epicentre site
- Decision to identify land at south / east of Knowsley Village as a broad location in preference to the Epicentre site is unjustified by evidence base and suggests that encroaching into the countryside (purpose 3 of NPPF Para. 80) is more important than the prevention of neighbouring towns merging together (purpose 2 of NPPF Para. 80) when considered at Stage 2 of the Green Belt Study (EB08)
- Significant positive benefits associated with the development of the Epicentre site and it should be removed from the Green Belt as it does not fulfill a key purpose of Green Belt land and exceptional circumstances can be demonstrated through evidence (Green Belt Study specific to Epicentre site included). Detailed proposals and a master plan will be able to illustrate this
- Mitigation of negative impacts should have been considered in more detail within the Green Belt Sustainability Appraisal
- Impacts of development on Green Belt should be considered at the site allocation stage - only safeguarded locations with least impact should be released for development

**Summary of
Suggested
Changes**

- Additional paragraph at 5.51 should be added to clarify that the proposed Epicentre site must be included within the potentially safeguarded sites surrounding Knowsley Village (specifically including the north eastern parcel)
- A comprehensive assessment/ masterplan of each Green Belt location must be undertaken to determine which would have the least impact on the Green Belt and those sites should be released first. This could be done at the land allocations stage

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), as supported by evidence in the Green Belt Study (EB08). As a consequence, the Council does not consider that the suggested change is necessary or appropriate.

**Summary of
Main Issues**

Objection to the reservation of Green Belt land at South Whiston (location 8) for residential development due to:

- there is no need for additional houses in the area
- impact on waiting times for doctor and dentist appointments
- increase in traffic, congestion and pollution
- impact on wildlife

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

**Summary of
Main Issues**

Objection to the omission of Shrog's Farm within the list of broad locations for Green Belt review, due to:

- the evidence base which identifies Green belt land and parcels is not accepted (see below)
- the development of the site for employment uses would contribute positively to the Core Strategy policies, aims and objectives, including the Spatial Vision, Policy CS1, Policy CS4, Policy CS7 and Policy CS9
- the site could be brought forward within a short time period
- the development of the site would not cause public contention
- the development of the site will not be affected by delays in delivering / funding enabling infrastructure
- the site is relatively modest in scale and divorced from the wider area

The conclusions of the Green Belt study regarding Shrog's Farm are contested, including:

- objection to the site being discounted at Stage 2 - it should have progressed through Stages 3 and 4
- objection to the treatment of the site as essential in maintaining the integrity of the Green Belt
- objection the grouping of the site with adjacent areas is also contested, as it is clear and distinct from adjacent land and has unique characteristics. Splitting the site would have led to it being assessed differently.
- parts of the assessment are contradictory and illogical, including the description of Shrog's Farm as not being related to the existing Green Belt boundary and its role in an "essential gap"
- the assessment makes unsubstantiated and naïve assertions, including that Shrog's Farm would not contribute to the sustainability of employment locations, as it is not located within an existing location, when it has synergy with nearby locations such as Axis Business Park
- objection to the classification of the site as agricultural land
- objection to the potential development of the site as impeding north-south green link movements
- the assessment should conclude that Shrog's Farm does not contribute in any meaningful way to the purposes of land within the Green Belt

Support for the assessment in the Green Belt Study that the development of Shrog's Farm would be screened by physical barriers.

The conclusions of the Inspector into the 2006 Knowsley UDP regarding the suitability of the site for employment development should be noted. This includes that the site is "...surrounded by major roads, is no longer viable as an agricultural unit and is in a sustainable location".

The treatment of the site in the Joint Employment Land and Premises Study is contested, including the dismissal of the site as a development opportunity and the failure to note the existing site access.

**Summary of
Suggested
Changes**

Shrog's Farm should be included on the list of reserved broad locations at paragraph 5.50.

Council Response: The Council considers that its treatment of Shrog's Farm has been robust and fully justified by an expansive evidence base including the Green Belt Study (EB08) and Technical Report: Green Belt (TR03).

Spatial Strategy

Objection

AE - Attending Examination

197

**Summary of
Main Issues**

- Welcome the proposed exclusion of “South of Whiston” and “Cronton Colliery (and adjacent land south of M62)” from the Green Belt and their identification for development.
- It is considered that the site to the South of Whiston, and Cronton Colliery and adjacent land should be given higher priority for release, should a choice need to be made.
- It is considered that the sites “South of Whiston” and “Cronton Colliery and adjacent land” have considerable sustainability and other advantages over the other Green Belt sites recommended for release
- The site to the South of Whiston, and Cronton Colliery and adjacent land should be designated as strategic site allocations by the Core Strategy because of their strategic importance and the need to bring them forward early in the plan period.
- The land proposed for release north and south of the M62 should be planned comprehensively to enable maximum strategic and sustainability benefits.
- The development should include (in line with JPL’s Concept Masterplan); the two sites north and south of the motorway developed comprehensively with development phased over the full plan period.
- The land north and south of the M62 should be shown for early release because of their potential contribution to housing and employment needs.
- The development should include (in line with JPL’s Concept Masterplan); a wide mix of housing types including affordable units, an emphasis on lower density and higher value housing; provision for a wide range of community / social facilities; provision for other major infrastructure including public transport and low carbon technology; main vehicular access via Lickers Lane with secondary access via Windy Arbor Road and Fox’s Bank Lane.
- The first phase of development should be off Lickers Lane to take advantage of the part of the site’s accessibility to public transport, schools and community facilities.
- The land south of the M62 should be developed for employment development and integrated with the country park (as proposed by the Land Trust).
- The employment development should be laid out so that it provides for large logistics and distribution users, advanced manufacturing knowledge-based industries and offices
- The main vehicular access for the land south of the M62 should be off Cronton Road (A5080) with secondary access onto Fox’s Bank Land (primarily for public transport).
- The delivery of comprehensive development north and south of the M62 would deliver gateway development of a strategic scale within an accessible location.

**Summary of
Suggested
Changes**

- List the sites which will be strategic allocations of the Core Strategy in Policy CS5.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), Technical Report: Planning for Housing Growth (TR01) and Technical Report: Planning for Employment Growth (TR02) relating to housing and employment requirements, as supported by evidence in the Green Belt Study (EB08), Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04), Joint

Employment Land & Premises Study (EB07) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested changes are necessary, noting that Policy CS5 ensures sufficient flexibility for appropriate Green Belt release to deliver the required development during the plan period and beyond.

109/1109.2/ 5.50 CS5 / S 2 / LC

Mr Adrian Jones

Burtons Way Plot Owners

Plan
Order.ID

Spatial Strategy

Objection

WR - Written Representation

197

**Summary of
Main Issues**

- Land at Valley Road (K008) should be considered. This would allow use of existing infrastructure and would retain GB separation.
- Do not agree that the Council's position that Land at Valley Road (K008) forms an essential gap and would significantly impact upon the separation of Kirkby and Liverpool settlements is justified.

**Summary of
Suggested
Changes**

- Land at Valley Road (K008) should be considered.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03) and Technical Report: Planning for Housing Growth (TR01) relating to housing requirements, as supported by evidence in the Green Belt Study (EB08), Strategic Housing Land Availability Assessment (EB01) and Strategic Housing Market Assessment (EB04). As a consequence, the Council does not consider that the suggested change is necessary or appropriate.

16/1016.1/ 5.50 CS5 / LC

Mr John Smallwood

RSPCA

Plan
Order.ID

Spatial Strategy

Support with Amends

WR - Written Representation

197

**Summary of
Main Issues**

- Request for clarification regarding the potential impact of Green Belt release at Location 7 on the operational requirements of the RSPCA Animal Centre at Higher Road, Halewood.
- Query whether the Local Authority would wish to use a Compulsory Purchase Order to acquire the RSPCA Animal Centre

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Further clarification sent via e-mail, noting that the Local Authority does not wish to CPO the RSPCA Animal Centre or place any other requirement on the RSPCA to develop their land holding. The evidence base for the Core Strategy does not assume any residential development will take place on the RSPCA's land holding. Consider no soundness or legal compliance issues raised.

14/1014.7/ 5.50 CS5

Jackie Copley

Lancashire Branch of the CPRE

Plan
Order.ID

Spatial Strategy

Objection

WR - Written Representation

197

**Summary of
Main Issues**

Concern regarding the adverse environmental impacts from the release of Green Belt sites south of Whiston. This will cause the loss of agricultural land and ecological habitats. This would be a significant loss to the rural economy and agricultural sector.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council has considered this issue through its evidence base, including the Green Belt Study (EB08) and Technical Report: Green Belt (TR03).

18/1018.2/ 5.50 CS5 / LC

Mr Jason Brown

Plan
Order.ID

Spatial Strategy

Objection

WR - Written Representation

197

Summary of Main Issues - Reference to an enclosed petition from Mr Jason Brown and other residents regarding opposition to the development of Green Belt Location 8.

Summary of Suggested Changes n/a

Council Response: - No petition was received by the Council. A number of associated letters were received, which have been recorded as separate representations.

115/1115.1/ 5.50 CS5 / S 2 / LC

Mr Andrew Armstrong

CLA

Plan
Order.ID

Spatial Strategy

Objection

AE - Attending Examination

197

Summary of Main Issues - Concern relates to the methodology, analysis and conclusions which underpin Green Belt release elements of the Plan at Policy CS5
- Land at Knowsley Lane / Pinfold Lane (identified as K020 in the Green Belt Study document - plan attached REF) being discarded is based on a flawed judgment of land quality relating to Agricultural Land Classification Grade 2, the land itself is a discrete land area wholly compromised for agricultural use and has no agricultural value.
- Land at Pinfold Lane meets all the criteria to justify its release from the Green Belt as well as being capable of delivering significant early benefit.

Summary of Suggested Changes - Add land at Knowsley Lane / Pinfold Lane in Knowsley Village (plan attached - REF) to the list of reserved sites identified at Para. 5.50.

Council Response: The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), as supported by evidence in the Green Belt Study (EB08). As a consequence, the Council does not consider that the suggested change is necessary or appropriate.

**Summary of
Main Issues**

Objection to the reservation of Green Belt land at South Whiston (Location 8) for residential development due to potential increases in;

- traffic,
- noise levels,
- air pollution,
- crime rates,
- extra stress on emergency services and;
- other issues relating to large housing estates.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

Spatial Strategy

Objection

WR - Written Representation

197

**Summary of
Main Issues**

Objection to Policy CS5 and Paragraph 5.50 as the remaining land at King's Business Park is not included as a reserved "broad location" for Green Belt review. This is due to:

- There is insufficient land available in the urban area of Knowsley for employment and housing development in the longer term.
- The development of the land at King's Business Park would contribute positively to the delivery of North Huyton and Stockbridge Village regeneration. Residential development would help to cross-subsidise employment development.
- The principle of the development on the site has been agreed by the Council within a previous planning permission
- The policy otherwise restricting development on the site to "limited infilling and redevelopment"

**Summary of
Suggested
Changes**

- Land at King's Business Park should be included as a broad location reserved within the Green Belt, and should have other restrictions on its development for housing and employment purposes lifted.

**Council
Response:**

The Council is satisfied that its approach to the treatment of the land at King's Business Park in retaining its existing status as a major existing developed site in the Green Belt is justified through available evidence including the Green Belt Study (EB08) and Technical Report: Green Belt (TR03).

**Summary of
Main Issues**

- Support identification of the Edenhurst Avenue and Halewood sites (Locations 4 and 7), including their ability to deliver market and affordable housing
- Both sites should be released for housing development, given constraints to housing delivery, the sites limited Green Belt value, the overall deliverability of the site, absence of community function and limited public benefits
- The potential developable area at Edenhurst avenue should be increased in accordance with flood risk information submitted
- Object to the proposed use of the Local Plan: Site Allocations and Development Management to formally redraw the boundaries of the Green Belt and encourage the release of the reserved sites for development through this document - clear evidence of under-provision of new housing required to be addressed through release of housing sites now rather than in late 2014 at the earliest

**Summary of
Suggested
Changes**

- Release of Green Belt sites through the Core Strategy.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), as supported by evidence in the Green Belt Study (TR08). As a consequence, the Council does not consider that the suggested change is necessary or appropriate.

**Summary of
Main Issues**

Assurance has been received that the land at Cronton Colliery in the ownership of the Land Trust will not be developed, and there will be no obligation or expectation for a change of use of this land (document attached - REF).

Noted that the Green Belt Study discounts parcels of land north of Cronton village for Green Belt review.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. Response is clarifying elements of the evidence base rather than making any suggested amendments.

Spatial Strategy

Objection

AE - Attending Examination

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**Summary of
Main Issues**

Objection to the release of Green Belt land at East Halewood due to:

- The width of the remaining Green Belt would be reduced to a narrow strip
- The area is attractive, affording views of the countryside and has high visual amenity and biodiversity value
- The area supports species covered in the North Merseyside Biodiversity Action Plan and additional farmland species

Objection to the release of Green Belt land at Knowsley Village due to:

- The countering of objectives to retain and enhance the landscape, visual amenity and biodiversity value of the area
- Visual amenity will be negatively affected as the remaining surrounding Green Belt is shielded by the Knowsley Estate perimeter wall
- The erosion of the setting and special character of the historic village

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness and legal compliance issues raised. All of the above-mentioned matters have been addressed through Policies based on the Council's evidence base.

**Summary of
Main Issues**

- Considerable concerns exist about the general approach as well as the detailed methodology that has been used.
- In addition there are grave concerns in how the sustainability appraisal has been used to justify the sites.
- The process is not even presented as one of selecting suitable locations for development, but of carrying out a Green Belt review, and so elevating the maintenance of Green Belt above the establishment of the most suitable strategy (and in core strategy terms, the most appropriate strategy).
- The methodology used is at odds with established good practice and more particularly with national planning policy. The plan uses a simplistic test to consider how development would fit with the purposes of including land within the Green Belt and the consequence is to undermine the achievement of the most sustainable strategy using the most appropriate development locations.
- The Council's methodology effectively discounts land for development solely on an interpretation of Green Belt purposes, and we believe an incorrect interpretation at that - consequently either policies SD1, CS1 and CS2 are unsound because they fail to accurately reflect the evidence about the areas and consequently do not set a sufficiently spatial strategy, or the strategy is unsound because it is not a product of these policies.
- The Green Belt policy test has been misapplied in specific locations at Halewood, particularly in terms of the purpose of preventing neighbouring towns from merging into one another, which has been used as a test in considering possible parcels of land for development, but not in a satisfactory way.
- Further concern about the dependence that the Core Strategy places upon the Green Belt review, is that the test of how development would fit with the purposes of including land within the Green Belt is incorrect and simplistic.
- The plan identifies one site currently in the Green Belt to be safeguarded from development after 2028 for residential purposes at Knowsley Village. This choice and the performance of this site is not clearly linked with the Green Belt review that has been undertaken. It is not explained why the approach is to identify land here and nowhere else, or how much development this land would deliver towards what target.
- The policy and the reserved sites listed at paragraph 5.50 are unsound because the identification of development locations is based on an incorrect process.
- Specific objection is made to the lack of inclusion of the site at Lydiate Lane, Halewood within the list of reserved sites. There is a need for more development than the plan provides for and for more of it to be located in Halewood. It is considered to be exceptionally well placed to form a sustainable extension to Halewood urban area because it is well located in relation to the current built up area where need for housing is arising, as well as to facilities and services. It is adjacent to a major developed site and effectively already largely enclosed by development, can provide safe highway and other access arrangements, has no strategic environmental assets or designations, is not in danger of flood risk, comprises poor quality agricultural land and can be developed without harm to the integrity and essential purpose of the Green Belt around Knowsley.
- Potential to strengthen infrastructure, services and facilities and improve public open space provision through the inclusion of Land at Lydiate Lane, Halewood.
- Lydiate Lane, Halewood has 'Halewood Sewage Treatment Works' immediately to the north and west which is designated in the Knowsley UDP as an Existing Major Developed Site in the Green Belt (Policy G6). The works provide containment such that the site is read as part of the urban fringe rather than open countryside. Identifying the subject land for development in this plan would provide for the planning of a block of land as a whole contained by Lydiate Lane, North End Lane and the Loop Line

(including the treatment works).

- Keeping this land open is not preventing two neighbouring towns from merging into one another. Its rejection in the first stage of Green Belt review on this basis is therefore an incorrect use of Green Belt policy.
- Land east and north of Lydiate Lane and Church Road is deliverable and developable offering a suitable location for housing development which could start in the very early part of the plan period, accessible by all modes of travel with no known constraints which would impede development.
- The two locations on the eastern edge of Halewood, north and South of Lower Road, which are proposed for release from the Green Belt would be in conflict with two purposes of including land in the Green Belt, namely to check the unrestricted sprawl of large built up areas and to assist in safeguarding the countryside from encroachment.
- The land at Greenbridge Lane is at a significant risk from flood events. This would be a constraint to development in the absence of measures to manage/attenuate flood risk.

See General Statement for further detailed comments.

Summary of Suggested Changes

- The policy should be rewritten based on a spatial strategy which considers the needs of the Borough and townships and sets out the most appropriate locations for development. Only then should a proper review of the green belt locations be undertaken. If this was done the policy would be different and different sites would be identified.
- Where the development is required according to the objective assessment of need, the promotion of sustainable patterns of development should prevail and there should be appropriate and intelligent redrawing of the Green Belt.
- The land promoted through these representations (Land at Lydiate Lane, Halewood) should be made available in this plan period to provide greater flexibility in the strategy, as well as to increase the amount of housing that can be delivered in the early stages of the plan and for the plan period as a whole.

Council Response:

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), Technical Report: Planning for Housing Growth (TR01) and Technical Report: Planning for Employment Growth (TR02) relating to housing and employment requirements, as supported by evidence in the Green Belt Study (EB08), Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04), Joint Employment Land & Premises Study (EB07) and Economic Viability Assessment (EB06).

**Summary of
Main Issues**

Opposition to inclusion of Green Belt land at South Whiston as a broad location for new residential development, due to:

- Consider the South Whiston area does not have sufficient supporting infrastructure including highways, schools, transport, drainage.
- Residents in South Whiston already suffer from flooding and this would be exacerbated by further demand brought by new residential development.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The Council's position is that the development of South Whiston can be supported by the appropriate infrastructure and services, as demonstrated through the Council's evidence base including the Green Belt Study (EB08), Technical Report: Green Belt (TR03), Strategic Flood Risk Assessment (EB14 & EB15) and Transportation Evidence (EB10 & EB11).

**Summary of
Main Issues**

- The whole area KGBS17 (Cronton Colliery and land south of M62) has been brought forward in a very uncertain and misleading way, including confusion of residents in terms of relationship to the Land Trust's proposed Country Park and it remaining safe as funding has been sought to fund development for over five years.

- A large question remains over the deliverability of the area that was to be taken forward for development (by the Land Trust) - references to levels of employment land have varied between 77 ha and 26.5 ha, with the Land Trust's statement (attached) quashing plans to develop their site for these purposes.

**Summary of
Suggested
Changes**

- The Core Strategy needs to make sure it presents clear and concise data and evidence that is not misleading.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), as supported by evidence in the Green Belt Study (EB08). In this regard, the evidence is considered to be robust, clear and consistent.

**Summary of
Main Issues**

Objection to potential reservation of Green Belt land at South Whiston (location 8) for new residential development due to:

- consideration still being given to the scheme despite 800 signatures in opposition being collected
- the unwelcome impact on the local environment
- increase in population leading to increased traffic and pollution, causing illnesses
- more places being required in local people
- extra demands on local health care services
- more crime and the need for extra policing
- the loss of natural habitat and green spaces for local enjoyment and exercise
- residents have moved to the area to escape from built-up environmental
- Whiston's unique character should be embraced and left for future generations.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base. Opposition arguments brought forward at earlier consultation stages have been considered in detail, as demonstrated through the Statement of Previous Consultation and the Accounting for the Preferred Options consultation.

34/1034.1/ 5.50 CS5

Mr Arnold Price

Plan
Order.ID

Spatial Strategy

Objection

WR - Written Representation

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**Summary of
Main Issues**

Protest at the proposal to turn Green Belt land at South Whiston (location 8) into a building site, due to:

- loss of local environment
- increased congestion and pollution
- impact on waiting times for doctors and clinics, etc
- impact on wildlife and habitats
- impact on existing residents

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

33/1033.1/ 5.50 CS5

Mr Jim Evans

Plan
Order.ID

Spatial Strategy

Objection

WR - Written Representation

197

**Summary of
Main Issues**

Objection to potential residential development on Green Belt land at South Whiston (location 8) due to:

- existing congestion issues which will be exacerbated
- existing satisfaction with services of Knowsley Council

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

**Summary of
Main Issues**

Opposition to the release of land at Green Belt Location 8 due to the potential impact on:

- access to health infrastructure
- school capacity
- the highway network through traffic congestion
- loss of countryside
- ecology

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

**Summary of
Main Issues**

Objection to the reservation of Green Belt at South Whiston (location 8) for new residential development, due to:

- political concerns regarding the role of the Labour Party
- local people don't wish to have Green Belt lost forever and it should be kept green for future generations
- the lack of local amenities including doctors, NHS dentists, schools, activities for teenagers
- impact on hospital waiting times
- impact of cars, smells and pollution

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

Spatial Strategy

Objection

WR - Written Representation

197

**Summary of
Main Issues**

Objection to the reservation of Green Belt land at South Whiston (location 8) for residential development due to:

- impact on existing residents at Halsnead Park
- increased congestion
- increased waiting times for doctors, hospitals, dentists
- impact on overcrowding in schools
- impact on availability of green open spaces for exercise
- impact on wildlife
- Whiston Village will be spoilt and overcrowded

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

48/1048.1/ 5.50 CS5

J and E Hoble

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Spatial Strategy

Objection

WR - Written Representation

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**Summary of
Main Issues**

Opposition to the reservation of Green Belt at South Whiston (location 8) for new residential development, due to:
- impact on residents of Halsnead Park seeking a peaceful, quiet environment
- impacts on local residents due to the lack of shops, doctors and schools
- destruction of wildlife habitats

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

18/1018.1/ 5.50 CS5 / S 1 2 4

Mr Jason Brown

Plan
Order.ID

Spatial Strategy

Objection

WR - Written Representation

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**Summary of
Main Issues**

Objection to the reservation of Green Belt land at South Whiston (Location 8) for residential development due to:
- a range of reasons including agricultural land quality, ecology, highways impact, recreational value and general infrastructure concerns.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

Spatial Strategy

Objection

WR - Written Representation

197

**Summary of
Main Issues**

Opposition to the reservation of Green Belt land at South Whiston (Location 8) for residential development due to the potential impact on:

- highways,
- schooling,
- council facilities,
- pollution,
- loss of agricultural land
- health care

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

Spatial Strategy

Objection

WR - Written Representation

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**Summary of
Main Issues**

Objection to reservation of Green Belt land at South Whiston (location 8) for residential development due to:

- proposals will obliterate what is left of the Green Belt
- impact on quality of life of existing residents of Halsnead Park and their homes
- impacts on residents of the surrounding area, due to strain on local services
- there are large brownfield sites in Huyton, Whiston and Prescot which could be developed as an alternative
- there is social housing that is being improved in the area
- impact of ruining a natural and protected resource
- various political concerns

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

Spatial Strategy

Objection

WR - Written Representation

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**Summary of
Main Issues**

Opposition to the reservation of Green Belt land at South Whiston (Location 8) for residential development due to implications for:

- wildlife and environment
- highways

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

**Summary of
Main Issues**

Objection to reservation Green Belt land at South Whiston (location 8) for residential development due to:

- impact of past development on green land in the Whiston area, which was once a rural settlement
- social problems caused by Licker's Lane development
- the majority of residents do not want more housing in the area
- the community's feelings have been disregarded

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base. The Council has undertaken previous consultation in accordance with its Statement of Community Involvement (PP15). At the Preferred Options stage, community feedback was considered in detail and responses published in the Accounting for Preferred Options document (SD04).

23/1023.1/ 5.50 CS5

Mr and Mrs R Todhunter

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Spatial Strategy

Objection

WR - Written Representation

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**Summary of
Main Issues**

Opposition to the reservation of Green Belt land at South Whiston (location 8) for residential development due to:

- increased transport congestion and pollution, particularly in Whiston Village
- increased waiting time for doctors / hospitals appointments
- lack of school places
- impact on wildlife, including numerous species
- insufficient green space in the local area, including role for older and younger people and in education.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base. Matters of detail regarding supporting infrastructure will be addressed at the planning application stage.

22/1022.1/ 5.50 CS5

Ms Wendy Moran

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Spatial Strategy

Objection

WR - Written Representation

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**Summary of
Main Issues**

- General opposition to the reservation of Green Belt land at South Whiston (Location 8).

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider that no soundness or legal compliance issues raised.

Spatial Strategy

Objection

WR - Written Representation

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**Summary of
Main Issues**

Objection to the inclusion of land at South Whiston within the reserved locations for development in the Green Belt, due to:

- the present highway network is struggling and the additional pressure of another 4000 cars on Tarbock and Rainhill Islands would cause traffic issues
- the local area is already short of employment opportunities and an influx of 4000 to 5000 will increase pressure
- the lack of amenities in the area, including schools, libraries, sports halls, youth clubs, etc.
- the local bus service is not fit for purpose
- another huge influx of people will be very damaging to the people in place now
- the local environment will suffer, including its role in serving local people and supporting habitats
- the local community will have the aftermath to live with

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

**Summary of
Main Issues**

Objection to the reservation of land at Green Belt South Whiston (location 8) for residential development due to:

- Knowsley has one of the highest housing repossession rates
- impact on traffic congestion and pollution
- impact on availability of places for children in local schools
- impact on hospital waiting lists
- further depletion of wildlife sites
- impact on wider area, not just neighbouring properties to the proposed development

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base.

Spatial Strategy

Objection

WR - Written Representation

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**Summary of
Main Issues**

Objection to the reservation of Green Belt land at South Whiston (location 8) for residential development due to:

- the consequences for the area would be devastating
- impact on provision of school places
- impact on doctor and hospital appointments
- impact on existing seclusion of Halsnead Park
- various political concerns

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at South Whiston have been explored through the Council's evidence base. Political concerns are not considered to be matters of soundness.

Spatial Strategy

Support with Amends

WR - Written Representation

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**Summary of
Main Issues**

- A portion of identified at Location 7 (Southern side of Higher Road, Halewood) is considered suitable for allocation for development from the beginning of the Plan period. It is capable of development / delivery in isolation from and independently from the larger portion of land within the location.

**Summary of
Suggested
Changes**

- Part of Location 7 should be identified as being available for development from the beginning of the Plan period.

**Council
Response:**

Noted. The Council is content that its approach to phasing of release of Green Belt locations is supported by evidence and is compliant with national policy.

Spatial Strategy

Objection

AE - Attending Examination

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**Summary of
Main Issues**

Issues with phasing of release of broad locations mean that land at Knowsley Village (Location 10) should be identified as a location reserved for urban extension pre-2028, due to:

- its development is likely to have a positive impact on the delivery of Plan objectives
- its size would help to rebalance the housing market, including the provision of larger, executive homes
- the site also benefits from nearby employment opportunities
- the site is available, deliverable and capable of providing a choice of housing in a well established location

**Summary of
Suggested
Changes**

Policy CS5 and Paragraph 5.50 should be amended to identify land at Knowsley Village (location 10) as a "reserved" location.

**Council
Response:**

The Council's approach to phasing of potential release of reserved Green Belt locations is justified through the Council's evidence base. This covers both the level of development to be achieved within these locations (Technical Reports) and the suitability of Green Belt locations to meet development needs (Green Belt Study - EB08). The Council is content that its approach is reflective of the wider objectives of the Plan, including a focus on urban regeneration and brownfield development.

**Summary of
Main Issues**

- Not justified as the evidence is flawed, including the methodology of the Technical Report: Green Belt (TR03) and Stage A of the Sustainability Appraisal of Green Belt Locations which scores parcels adjacent to KIP differently – KGBS3 should be included as a reserved location if KGBS4 is included. Parcels could be used for alternative types of development which would reduce the pressure elsewhere in the Borough
- Not justified as the evidence is flawed regarding the treatment of the employment land capacity at Cronton Colliery (Location 9) in the Green Belt Study
- Not justified as the methodology regarding grouping of parcels and definition of boundaries in the Green Belt Study (E008) is flawed, particularly KGBS14
- Not effective as land at Cronton Colliery (part of Location 9) is not deliverable for employment uses, due to extant planning permission for a country park

**Summary of
Suggested
Changes**

- All information of how decisions have been made should be provided
- All areas should be reconsidered again
- Re-consultation with KGBS4 (or part of it) in Kirkby included as an alternative employment use site, and KGBS6 could provide an alternative site for housing
- The country park site at Land south of M62 / Cronton Colliery (parcels K057 and K058 in the Green Belt Study - Location 9) should remain in the Green Belt and be removed from Strategy proposals
- Land to the South of Whiston (KGBS14 - Location 8) should be reconsidered again and as separate parcels (K045, K048, K052 and K053)

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), as supported by evidence in the Green Belt Study (EB08) and Sustainability Appraisal of Green Belt Locations. As a consequence, the Council does not consider that the suggested changes are necessary or appropriate.

Spatial Strategy

Objection

AE - Attending Examination

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**Summary of
Main Issues**

Paragraph 5.50 should make it clear that there is no implied order of preference in the "broad locations" listed for Green Belt release.

**Summary of
Suggested
Changes**

Paragraph 5.50 should make it clear that there is no implied order of preference in the "broad locations" listed for Green Belt release.

**Council
Response:**

It is considered that paragraph 5.50 already includes the requisite clarity and therefore no change is needed.

Spatial Strategy

Objection

AE - Attending Examination

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**Summary of
Main Issues**

- Housing on the entrance to Prescott at Prescott Nursery would destroy the panorama, be a monstrosity and Green Belt vandalism.
- Impact of development upon wildlife in Knowsley Park that should be protected under the Countryside and Rights of Way Act 2000.
- Potential loss of playing fields at Knowsley Lane due to Green Belt release at Area (3) conflicts with the objective to improve the quantity, quality and accessibility of local greenspaces in Policy CS21.
- Land at Knowsley Village (for Housing) - Area (10) is ambiguous as there is no hatching on the maps comparable to other areas.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03) as supported by evidence in the Green Belt Study (EB08).

**Summary of
Main Issues**

Objection to the approach in Policy CS5 including:

- the Plan does not reflect the priorities for provision of good quality greenspace, green infrastructure, and strategic green links
- the Plan does not reflect the area priorities for Prescot and Whiston
- the Plan makes available more housing land within the Green Belt than is needed to meet plan period needs. This is far too excessive and is likely to lead to pressure for development on areas of reserved land which may not be the most appropriate location.
- the approach of identifying too much land to be removed from the Green Belt is not consistent with national policy
- a more precise identification of areas of land reserved for housing up to 2028, with further land safeguarded, would be a more justified approach

Objection to the approach of land at South Whiston (Location 8) due to:

- the area of land west of the dismantled railway at Location 8 should be excluded from the urban extension and identified as protected greenspace, which would: secure the protection of the Local Wildlife Site; create a more substantial link between the open greenspace to the north and the further Local Wildlife Site to the south of the M62; represent an important green lung in a potentially densely developed area; address the priority of improving the quality of local green space; serve a significant environmental benefit; protect agricultural quality of the land; avoid impact on residential properties and protected trees.
- the aforementioned land (west of railway) is not deliverable for housing, and its exclusion would only affect a very small area of potential housing land. Given flexibility built into the plan, this would not have any significant impact on housing numbers. The area could be compensated by including in the broad location land excluded, for example the area of land to the south of Lickers Lane in the vicinity of Halsnead Park. This alternative is in the Council's ownership and therefore should be deliverable.
- the aforementioned land (west of railway) cannot be accessed due to proximity to the motorway slip road. Any access would involve the removal of protected woodland and habitats associated with the Local Wildlife Site.

**Summary of
Suggested
Changes**

Amend the area shown as an urban extension to the south of Whiston to exclude the approximately triangular areas of land to the west which is defined by the M62 motorway, Windy Arbor Road / Brow and the dismantled railway line running north to south. This area could be defined as greenspace.

**Council
Response:**

The Council's approach within Policy CS5, Paragraph 5.50 and the Key Diagram within the Core Strategy has been to identify broad locations only for future development. Paragraph 5.57 of the plan makes it clear that the areas identified will remain within the Green Belt until the adoption of a subsequent part of the Local Plan. This is in accordance with the strategic nature of the Core Strategy. The Council is satisfied that its approach is sound. These detailed representations regarding site boundaries can be considered at the stage of preparation of the Local Plan: Site Allocations and Development Policies document.

**Summary of
Main Issues**

Objection to the approach in Policy CS5 including:

- the Plan does not reflect the priorities for provision of good quality greenspace, green infrastructure, and strategic green links
- the Plan does not reflect the area priorities for Prescot and Whiston
- the Plan makes available more housing land within the Green Belt than is needed to meet plan period needs. This is far too excessive and is likely to lead to pressure for development on areas of reserved land which may not be the most appropriate location.
- the approach of identifying too much land through the Plan is not consistent with national policy
- a more precise identification of areas of land reserved for housing up to 2028, with further land safeguarded, would be a more justified approach

Objection to the approach of land at South Whiston (Location 8) due to:

- the area of land west of the dismantled railway at Location 8 should be excluded from the urban extension and identified as protected greenspace, which would: secure the protection of the Local Wildlife Site; create a more substantial link between the open greenspace to the north and the further Local Wildlife Site to the south of the M62; represent an important green lung in a potentially densely developed area; address the priority of improving the quality of local green space; serve a significant environmental benefit; protect agricultural quality of the land; avoid impact on residential properties and protected trees.
- the aforementioned land (west of railway) is not deliverable for housing, and its exclusion would only affect a very small area of potential housing land. Given flexibility built into the plan, this would not have any significant impact on housing numbers. The area could be compensated by including in the broad location land excluded, for example the area of land to the south of Lickers Lane in the vicinity of Halsnead Park. This alternative is in the Council's ownership and therefore should be deliverable.
- the aforementioned land (west of railway) also the land cannot be accessed due to proximity to the motorway slip road. Any access would involve the removal of protected woodland and habitats associated with the Local Wildlife Site.

**Summary of
Suggested
Changes**

Amend the area shown as an urban extension to the south of Whiston to exclude the approximately triangular areas of land to the west which is defined by the M62 motorway, Windy Arbor Road / Brow and the dismantled railway line running north to south. This area could be defined as greenspace.

**Council
Response:**

The Council's approach within Policy CS5, Paragraph 5.50 and the Key Diagram within the Core Strategy has been to identify broad locations only for future development. Paragraph 5.57 of the plan makes it clear that the areas identified will remain within the Green Belt until the adoption of a subsequent part of the Local Plan. This is in accordance with the strategic nature of the Core Strategy. The Council is satisfied that its approach is sound. These detailed representations regarding site boundaries can be considered at the stage of preparation of the Local Plan: Site Allocations and Development Policies document.

Spatial Strategy

Objection

AE - Attending Examination

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**Summary of
Main Issues**

Issues with phasing of broad location release mean that land at Knowsley Lane (Location 3) should come forward within the 0-5 year period of the plan. Its development could;

- help tackle deprivation,
- rebalance the housing market,
- create jobs in regeneration areas and;
- bring benefits as a gateway location.

**Summary of
Suggested
Changes**

The phasing mechanism of CS5 and paragraph 5.50 should be amended in order that Land at Knowsley Lane (Location 3) can come forward within the 0-5 year period of the plan.

**Council
Response:**

The Council's approach to phasing of potential release of reserved Green Belt locations is justified through the Council's evidence base. This covers both the level of development to be achieved within these locations (Technical Reports) and the suitability of Green Belt locations to meet development needs (Green Belt Study - EB08). The Council is content that its approach is reflective of the wider objectives of the Plan, including a focus on urban regeneration and brownfield development.

Spatial Strategy

Support with Amends

AE - Attending Examination

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**Summary of
Main Issues**

- Fully support the identification of Land to the East of Halewood (Location 7) for housing development

**Summary of
Suggested
Changes**

- The need to release 'East of Halewood' (Location 7) from the Green Belt without delay, and to allocate the site for housing, to ensure the Council is able to adequately meet Halewood's future housing needs

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), Technical Report: Planning for Housing Growth (TR01) relating to housing requirements, as supported by evidence in the Green Belt Study (EB08), Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate.

Spatial Strategy

Objection

WR - Written Representation

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**Summary of
Main Issues**

Objection to the approach in Policy CS5 including:

- the Plan does not reflect the priorities for provision of good quality greenspace, green infrastructure, and strategic green links
- the Plan does not reflect the area priorities for Prescot and Whiston
- the Plan makes available more housing land within the Green Belt than is needed to meet plan period needs. This is far too excessive and is likely to lead to pressure for development on areas of reserved land which may not be the most appropriate location
- the approach of identifying too much land through the Plan is not consistent with national policy
- a more precise identification of areas of land reserved for housing up to 2028, with further land safeguarded, would be a more justified approach

Objection to the approach of land at South Whiston (Location 8) due to:

- the area of land west of the dismantled railway at Location 8 should be excluded from the urban extension and identified as protected greenspace, which would: secure the protection of the Local Wildlife Site; create a more substantial link between the open greenspace to the north and the further Local Wildlife Site to the south of the M62; represent an important green lung in a potentially densely developed area; address the priority of improving the quality of local green space; serve a significant environmental benefit; protect agricultural quality of the land; avoid impact on residential properties and protected trees.
- the aforementioned land (west of railway) is not deliverable for housing, and its exclusion would only affect a very small area of potential housing land. Given flexibility built into the plan, this would not have any significant impact on housing numbers. The area could be compensated by including in the broad location land excluded, for example the area of land to the south of Lickers Lane in the vicinity of Halsnead Park. This alternative is in the Council's ownership and therefore should be deliverable.
- the aforementioned land (west of railway) also the land cannot be accessed due to proximity to the motorway slip road. Any access would involve the removal of protected woodland and habitats associated with the Local Wildlife Site.

**Summary of
Suggested
Changes**

Amend the area shown as an urban extension to the south of Whiston to exclude the approximately triangular areas of land to the west which is defined by the M62 motorway, Windy Arbor Road / Brow and the dismantled railway line running north to south. This area could be defined as greenspace.

**Council
Response:**

The Council's approach within Policy CS5, Paragraph 5.50 and the Key Diagram within the Core Strategy has been to identify broad locations only for future development. Paragraph 5.57 of the plan makes it clear that the areas identified will remain within the Green Belt until the adoption of a subsequent part of the Local Plan. This is in accordance with the strategic nature of the Core Strategy. The Council is satisfied that its approach is sound. These detailed representations regarding site boundaries can be considered at the stage of preparation of the Local Plan: Site Allocations and Development Policies document.

**Summary of
Main Issues**

Land at Shrog's Farm should be included within the broad locations to be reserved from the Green Belt for future development, due to:

- the site has been promoted with the Council on several occasions
- there is no drainage or flood risk to the land, although referred to in the Green Belt Sustainability Appraisal as a constraint
- consultants failed to recognise that the site can be accessed from the A580
- consultants failed to acknowledge that the provision of the Merseytram enhances public transport to the site, part of which is subject to compulsory purchase rights to provide the necessary infrastructure works, indicating that the site is recognised as development land
- the site would help deliver many of the aspirations of Policy CS7
- failure to carry out robust assessments and prejudging the land renders the Council's approach unsound
- the land meets the policy of being part of the City Region
- the land is able to contribute to the Plan's Vision and Objectives to encourage and maintain sustainable economic and employment growth
- the aspirations for the land could be jeopardised by the Council's desire to maintain an "essential gap" , when there is no other requirement for such a gap with Knowsley's entire boundary with Liverpool

**Summary of
Suggested
Changes**

Land at Shrog's Farm should be included in Policy CS5 section 5.50 in the identified reserved locations for employment. This could be underpinned by:

- its value to help deliver Gateway locations in Policy CS11, aspects of Policy CS4 (1a-d)
- its ability to assist the Council's objective for Merseytram (paragraph 2.28)
- the re-designation would have no tangible impact on Green Belt as the land is surrounded by high motorway embankments
- the site could provide a front door entrance into Knowsley from Liverpool

**Council
Response:**

The Council's selection of reserved locations for potential release from the Green Belt has been informed by a wide range of evidence. The Council is content that its approach to the assessment of Shrog's Farm has been undertaken in a robust manner.

Spatial Strategy

Objection

AE - Attending Examination

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**Summary of
Main Issues**

Objection the treatment of locations within Paragraph 5.50 including:

- Land on Knowsley Lane (Location 3) should remain as green fields to retain a rural feel in the area
- Land bounded by the A58 (Location 5) should be designated as Green Belt
- Land at Carr Lane (Location 6) is near to a sewerage treatment sites and should only be considered for employment uses
- Opposition to housing development in South Whiston (Location 8)
- Objection to the proposal for housing at Home Farm, Knowsley Village (Location 10)
- Any further release of Green Belt land for industrial uses around Knowsley Village will erode character of the area

**Summary of
Suggested
Changes**

Removal of the following from Paragraph 5.50:

- Location 3
- Location 5
- Location 8
- Location 10

Clarification required on the following:

- Location 6 should only be considered for employment uses
- Note that no further Green Belt land around Knowsley Village should be released for industrial use.

**Council
Response:**

Consider no soundness or legal compliance issues raised. The selection of locations has been informed by the Council's evidence base, including the Green Belt Study (EB08) and Technical Reports.

Spatial Strategy

Objection

AE - Attending Examination

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**Summary of
Main Issues**

Objection to the inclusion of South Whiston (housing - Location 8) as a broad location for Green Belt release, due to:

- Increased pollution
- Congestion on roads
- Impact upon access for emergency services
- Lack of school provision
- Reference to the Council approach to a 1994 petition relating to the Green Belt status of the land

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03) as supported by evidence in the Green Belt Study (EB08) and the Infrastructure Delivery Plan.

Spatial Strategy

Objection

WR - Written Representation

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**Summary of
Main Issues**

Objection to the reservation of at Cronton Colliery / land south of the M62 (Location 9) for Green Belt release, due to:

- it seems counterproductive to change the status of land which was sold to the Land Trust for conversion into a country park
- it would be better to convert the whole site into parkland and use alternatives for development
- previous planning applications for this location failed

**Summary of
Suggested
Changes**

- Remove change of Green Belt status at Location 9, including Cronton Colliery

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at Location 9 have been explored through the Council's evidence base, including the Green Belt Study (EB08) and Technical Reports (TR02-03).

100/1100.4/ 5.50 CS5 / S 1 2 3 4 / LC

Ms Lindsay Grey

NV Assets

Plan
Order.ID

Spatial Strategy

Objection

AE - Attending Examination

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**Summary of
Main Issues**

- The Bank Lane location should be considered favourably as a gateway site and can assist in regeneration of Tower Hill, and there are no constraints to the site's development therefore should be brought forward for residential development within the 0-5 year period.

**Summary of
Suggested
Changes**

- Bank Lane should be subject to a detailed boundary amendment to the Green Belt.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), as supported by evidence in the Green Belt Study (EB08). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate.

101/1101.3/ 5.50 CS5 / LC

Mrs Josephine Bennett

Plan
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Spatial Strategy

Objection

WR - Written Representation

197

**Summary of
Main Issues**

- Cronton Colliery is below sea level and an area of severe subsidence, with an associated risk of flooding.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), as supported by evidence in the Green Belt Study (EB08) and the Strategic Flood Risk Assessment (EB14 & EB15).

91/1091.1/ 5.50 CS5 / LC

Mr Neil Draper

Plan
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Spatial Strategy

Support

AE - Attending Examination

197

**Summary of
Main Issues**

- Support for the Plan's approach
- Objection to lobbying by landowners near North End Lane (North / West Halewood) for inclusion of their sites as locations for Green belt review. The landowners are motivated by profit and not legitimate planning consideration.

**Summary of
Suggested
Changes**

- No changes should be made, the Council and the Inspector should resist lobbying from landowners in Halewood.

**Council
Response:**

Noted.

84/1084.1/ 5.50 CS5 / S 2 / LC

J M Carter

Rainhill Civic Society

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Spatial Strategy

Objection

AE - Attending Examination

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**Summary of
Main Issues**

Concern regarding reservation of land at Locations 8 and 9 from the Green Belt, due to:
- the original Green Belt boundary in the area was previously breached in the 1960s and 70s
- impact on the destruction of Green Belt between Knowsley and St.Helens, although St.Helens propose no Green Belt release in their Core Strategy
- there are many greenfield sites on the Stockbridge Village estate which could be developed before taking Green Belt land

**Summary of
Suggested
Changes**

Delete proposal for Locations 8 and 9.

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at Locations 8 and 9 have been explored through the Council's evidence base, including the Green Belt Study (EB08) and Technical Reports (TR01 - TR03).

68/1068.2/ 5.50 CS5

Mr John Woollam

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Spatial Strategy

Objection

WR - Written Representation

197

Summary of Main Issues For the area off Greensbridge Lane, Lower Road and Ditton Brook (location 7), question whether account has been taken that this area is susceptible to flooding, and that the area is cultivated for food production.

Summary of Suggested Changes n/a

Council Response: The Council has considered the characteristics and constraints of each of the Green Belt parcels, including Location 7, through its evidence base including the Green Belt Study (EB08) and Technical Report: Green Belt (TR03).

96/1096.2/ 5.50 CS5 / S 2 3 4

Mr Peter Davis

Whiston Green Belt Action Group

Plan
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Spatial Strategy

Objection

AE - Attending Examination

197

Summary of Main Issues - Objection to the inclusion of food producing farmland at Whiston as it is not effective and sustainable to let the urban / rural fringe be built first.
- Reasons include inadequate associated infrastructure (roads, schools, etc), lack of bus service after 7pm which disadvantages less mobile members of society and increased traffic congestion without adequate mitigation in the Plan

Summary of Suggested Changes - Recommend withdrawal of proposal to build on farmland at Whiston which is designated as Green Belt to make it relevant to the economic climate and compliant with national policy.

Council Response: The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), as supported by evidence in the Green Belt Study (EB08). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate.

68/1068.1/ 5.50 CS5

Mr John Woollam

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Spatial Strategy

Objection

WR - Written Representation

197

**Summary of
Main Issues**

Question whether the area bounded by Lydiate Lane, the Loop Line, the road to and from the water works, and North End Lane have been considered.

**Summary of
Suggested
Changes**

Further consideration should be given to area bounded by Lydiate Lane, the Loop Line, the road to and from the water works, and North End Lane.

**Council
Response:**

This area, along with all other parcels of the Knowsley Green Belt, has been considered through the Council's evidence base including the Green Belt Study (EB08) and Technical Report: Green Belt (TR03).

68/1068.3/ 5.50 CS5

Mr John Woollam

Plan
Order.ID

Spatial Strategy

Objection

WR - Written Representation

197

**Summary of
Main Issues**

For the area bounded by the railway line, Lower Road, Finch Lane, RSPCA area and Baileys Lane (Location 7), question whether the cultivation of the area for food production has been considered.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council has considered the characteristics and constraints of each of the Green Belt parcels, including Location 7, through its evidence base including the Green Belt Study (EB08) and Technical Report: Green Belt (TR03).

Spatial Strategy

Objection

WR - Written Representation

Summary of Main Issues Question how the historic character and heritage assets within Halewood and Tarbock Village can be protected and enhanced by the provision of new housing.

Summary of Suggested Changes n/a

Council Response: The Council has considered the characteristics and constraints of each of the Green Belt parcels, including the historic environment, through its evidence base including the Green Belt Study (EB08) and Technical Report: Green Belt (TR03).

**Summary of
Main Issues**

Objection to the reservation of land at Edenhurst Avenue (location 4) for residential development due to:

- lack of community participation and others having an interest in the area
- lack of consideration of flood risk at the site and compliance with PPS25 sequential test
- impact of flood risk reducing the developable area of the location, preventing the establishment of a long term defensible Green Belt boundary
- the development of the site could exacerbate flooding elsewhere, including Edenhurst Avenue and Bowring Park Avenue
- due to its size and characteristics, the development of the site would add little to the sustainability of the wider area and would be too small to support any new community facilities or infrastructure
- questions over whether the use of Green Belt to support uncertain housing targets with error margins is appropriate
- the site contains an identified Site of Biological Interest, which would be diminished or lost, contrary to the objectives of PPG2
- the land was sold for a low value in line with its Green Belt status, significantly below market value for a housing site
- the site is a "windfall" site on which development should not be permitted except in exceptional circumstances. This has not been considered in sufficient detail
- a previous planning application for the site (2005) was rejected by the Council, the grounds for objection remain valid,
- UDP figures clearly show that sufficient land is allocated in Knowsley until 2016
- Development would increase urban sprawl and merging of areas which is against NPPF
- No substantiation exists for claims that development of the site will bring very positive benefits to the local community, including any enhanced sports and recreation facilities
- increase in number of youths in the area which could increase anti social behaviour
- development will place strain on the local school and roads - the Bowring Park estate is a no through road access
- the drive for localism should allow communities to protect the character of their neighbourhoods, this requires more than just consultation

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at Edenhurst Avenue have been explored through the Council's evidence base.

**Summary of
Main Issues**

- There is a need to look beyond established employment areas to other sustainable and appropriate locations, even if these are in the Green Belt.
- Green Belt locations close to population centres and with good access should be promoted to meet particular needs of large scale logistics users.
- Existing reserved Green Belt locations are constrained and their size, location and quality will not meet the needs of the logistics sector (appraisal evidence supplied).
- Land at Axis Business Park is the best suitable candidate to meet employment land needs, including for logistics uses and is significant from a commercial market perspective. It can be developed without compromising the purpose of the GB and is well served by infrastructure and labour markets and is in close proximity to the Port of Liverpool. It is available and deliverable within the first five years of the plan.
- Other locations may not be delivered or are not suitable to meet needs of logistics developer: Cronton Colliery, Land at East of KIP.
- Concerns expressed regarding the accuracy of the appraisal in the Green Belt Study (EB08), Conclusions regarding land at Axis Business Park are too simplistic – there is a need to look in more detail at the character of the area and other locations were not assessed properly – Cronton Colliery, Land East of KIP, Land at Maypole Farm
- The Green Belt Sustainability Appraisal supports the conclusion that land at Axis Business Park is well suited for logistics development.

**Summary of
Suggested
Changes**

- Add Axis Business Park to the list of 'reserved' locations for employment at Para. 5.50.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant. Appropriate explanation and justification of the employment land requirements in the Local Plan are included within the Technical Report: Planning for Employment Growth (TR02) and Technical Report: Green Belt (TR03), as supported by evidence in the Joint Employment Land and Premises Study (EB07), and the Green Belt Study (EB08). As a consequence the suggested change is not necessary.

Spatial Strategy

Support

AE - Attending Examination

197

**Summary of
Main Issues**

Support of the exclusion of Lydiate Lane, Halewood from the list of broad locations for Green Belt release in Para 5.50, due to the following reasons:

- the site being within the existing Green Belt
- development would constitute inappropriate development in the Green Belt
- it site is safeguarded to prevent encroachment in the countryside
- site development would result in loss of openness of the Green Belt
- loss of valuable agricultural land
- development would have an adverse effect on priority habitats / trees
- significantly add to an already overloaded local road network, including Gerrards Lane, Church Lane, Lydiate Lane, Mackets Lane and Halewood Road
- lack of significant commercial value to Ravenscourt due to the close proximity of Woolton and Belle Vale.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Noted

Spatial Strategy

Objection

WR - Written Representation

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**Summary of
Main Issues**

Objection to the redesignation of land at Edenhurst Avenue (location 4), due to the impacts of development on:

- strain on local amenities
- strain on surrounding roads
- spaces at the local primary school and congestion on surrounding roads
- the quality of life of local residents
- flooding and drainage, on the site and increased risk for surrounding residents
- local wildlife habitats, which the local authority have a duty to protect

**Summary of
Suggested
Changes**

The land at Edenhurst Avenue should be removed from the policy.

**Council
Response:**

Consider no soundness or legal compliance issues raised. The impacts of the development of land at Edenhurst Avenue have been explored through the Council's evidence base. Matters of detail regarding supporting infrastructure will be addressed at the planning application stage.

Spatial Strategy

Objection

AE - Attending Examination

199

Summary of Main Issues - Evidence in the Technical Report: Green Belt is not justified, Table 4.3 implies that KGBS17 (Cronton Colliery) is adjacent to KGBS14 (Land to the South of Whiston), using this to justify development of both sites together, yet the M62 divides the site clearly separating them.

Summary of Suggested Changes - Disengage the development of KGBS17 from KGBS14 and keep KGBS17 (Cronton Colliery) in the Green Belt.

Council Response: The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), as supported by evidence in the Green Belt Study (EB08). As a consequence, the Council does not consider that the suggested change is necessary or appropriate.

Spatial Strategy

Objection

AE - Attending Examination

200

Summary of Main Issues - Inclusion of KGBS17 (Cronton Colliery and adjacent land south of the M62) in the Strategy following removal at Stage 2 of the Green Belt Study due to being 'not contained'. Reinsertion of KGBS17 at Stage 4 of the Green Belt Study is not consistently applied, given the physical separation provided by a motorway.

Summary of Suggested Changes - Apply evidence criteria consistently through decision making process and stop ignoring / changing it when it suits the Council, as there are more eligible parcels for consideration.

Council Response: The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), as supported by evidence in the Green Belt Study (EB08). In this regard, the inclusion of Cronton Colliery within the Strategy is considered both reasonable and appropriate.

Spatial Strategy

Objection

AE - Attending Examination

200

Summary of Main Issues - The Land Trust own K058 (Cronton Colliery) and have publicly stated that they will not be developing any of the site, yet the Local Plan assumes it will and by doing so will support development of K057, which in turn will support moving both K058 and K057 (together known as KGBS17) out of the Green Belt. This is flawed.

Summary of Suggested Changes - KGBS17 should remain protected as part of the Green Belt.

Council Response: The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), as supported by evidence in the Green Belt Study (EB08). As a consequence, the Council does not consider that the suggested change is necessary or appropriate.

Spatial Strategy

Objection

AE - Attending Examination

202

Summary of Main Issues - Knowsley's recent housing delivery highlights an under-supply of deliverable sites. Housing delivery should be a policy priority in Knowsley. The NPPF does not suggest that other planning objectives should override this.
- It is contrary to the NPPF to invent a trigger mechanism for the release of Green Belt sites which is depending on not prejudicing wider urban regeneration objectives.

Summary of Suggested Changes Paragraph 5.55 should be brought in line with the NPPF.

Council Response: The Council believes that its approach in Policy CS5 is compliant with the NPPF, and with the wider aims and objectives of the Plan for urban regeneration. No change is considered necessary.

**Summary of
Main Issues**

- Green Belt sites should be released as part of the Core Strategy, in order that a five year supply can be maintained, housing targets met and previous undersupply addressed. This will also create an earlier stimulus for the local economy.
- Delaying this action until a subsequent Site Allocations plan will create greater issues.

**Summary of
Suggested
Changes**

- Strategic alterations to the Green Belt should be detailed in the Core Strategy and detailed site plans attached as an appendix (REF)

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), as supported by evidence in the Green Belt Study (EB08). As a consequence, the Council does not consider that the suggested change is necessary or appropriate.

**Summary of
Main Issues**

- The Council has failed to properly engage with members of the group when seeking answers to legitimate questions on the background to the Council's policy initiatives.

- Planning permission granted for retail development and supported by policy CS6 is in conflict with Para. 5.64 in terms of the contribution of edge of centre and out of centre retail developments not being considered to positively contribute to the viability and vitality. Whereas the scale of growth in Kirkby town centre undermines the policy objective of equal roles for the three main town centres.

**Summary of
Suggested
Changes**

- Recommendation to recognise that the existing town centres is capable of providing a sustainable retail development relative to local needs and reduce to a modest increase in additional floorspace relative to the existing UDP policy.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant, with associated explanation and justification provided in the Technical Report: Planning for Retail (TR04), as supported by evidence in the Knowsley Town Centres and Shopping Study (EB12 & EB13). In this regard, it should be noted that the policy approach is consistent with the extant outline planning permission for a mixed use development to comprehensively regenerate Kirkby Town Centre including retail expansion to the south of Cherryfield Drive, which was granted in 2011.

**Summary of
Main Issues**

- Concerns expressed over the encouragement of residential development and night time economy in Kirkby town centre, together with the non-consideration of a previous Planning Inspectorate decision in 2009.

**Summary of
Suggested
Changes**

- Recommendation to delete the provision for residential development,
- Acknowledge the decisions and reasoning that ruled out the desirability to extend Kirkby Town Centre to an edge of centre retail park and avoid conflict with local, regional and national planning policies. (CS6 Para 5.59)

**Council
Response:**

The Council supports its policy approach as sound and legally compliant, with associated explanation and justification provided in the Technical Report: Planning for Retail (TR04), as supported by evidence in the Knowsley Town Centres and Shopping Study (EB12 & EB13). In this regard, it should be noted that the policy approach is consistent with the extant outline planning permission for a mixed use development to comprehensively regenerate Kirkby Town Centre including retail expansion to the south of Cherryfield Drive, which was granted in 2011.

**Summary of
Main Issues**

- Concerns expressed over the consistency of Policy CS6, Para 5.59 and Table 5.3 in terms of the scale of growth proposed in Kirkby and the resultant implications for the objective of an equal role for the three town centres
- Government Inspector rejected an almost identical edge of centre development and demolition of 78 houses in Kirkby in 2009, the Council never gave any consideration of the previous decisions, particularly the merits of the existing town centre to provide retail use
- The Council approach is in conflict with Policy CS6 Para. 5.64
- No justification to include housing on Cherryfield Drive as part of the retail space for an enlarged town centre, this is contrary to a deteriorating economic position across the UK high streets and shopping parades
- The so-called retail led regeneration argument is discredited as it is leading to the loss of civic amenities that are not being replaced and an increase in vacant retail units since 2008/09
- Concerns expressed over the encouragement of residential development and night time economy in Kirkby town centre

**Summary of
Suggested
Changes**

- Amend Policy CS6 wording to support a retail development of an appropriate scale in the existing Kirkby town centre, including a modest increase in the existing UDP allocation of 9,000 sq.m food store in the existing town centre
- Delete the provision for residential development
- Acknowledge the decisions and reasoning that ruled out the desirability to extend Kirkby Town Centre to an edge of centre retail park
- Avoid conflict with local, regional and national planning policies

**Council
Response:**

The Council supports its policy approach as sound and legally compliant, with associated explanation and justification provided in the Technical Report: Planning for Retail (TR04), as supported by evidence in the Knowsley Town Centres and Shopping Study (EB12 & EB13). In this regard, it should be noted that the policy approach is consistent with the extant outline planning permission for a mixed use development to comprehensively regenerate Kirkby Town Centre including retail expansion to the south of Cherryfield Drive, which was granted in 2011.

**Summary of
Main Issues**

- Concerns expressed over the consistency of Policy CS6 and Para 5.59 in terms of the inappropriate scale of growth proposed in Kirkby and the resultant implications for the objective of an equal role for the three town centres
- Government Inspector rejected an almost identical edge of centre development in Kirkby in 2009, confirming that the existing town centre being able to provide a retail development relative to local needs and precluded houses being lost to provide a greenfield site for a supermarket
- Unsafe to increase the retail size of Kirkby to 42,000 sq.m from a very weak trading position that could take years to turn around, due in part, to the Council turning away a major retail development in 2005, with the Council having been urged to regenerate the town centre since 1984
- The previous scheme was proposed to be delivered on a Primary Catchment Area of 240,000, Kirkby's population is 42,000
- Comparison shopping should be commensurate with the reality that Kirkby residents see Liverpool City Centre as their preference for comparison shopping, which is supported by rail services and bus links between these destinations
- Naïve to assume that the majority of Kirkby residents can be ring fenced to support a huge increase in retail space in Kirkby Town Centre when Ormskirk and Aintree are also within easy reach

**Summary of
Suggested
Changes**

- Withdraw the current Policy CS6 and re-define the policy to provide a retail development of appropriate scale and size for Kirkby as determined by a Government Inspector
- The size of a major supermarket in Kirkby should be set against local needs and other retailers to provide choice and competition - approximately 9,000 sq.m
- Request to remove the proposed town centre expansion, including the housing in Spicer Grove

**Council
Response:**

The Council supports its policy approach as sound and legally compliant, with associated explanation and justification provided in the Technical Report: Planning for Retail (TR04), as supported by evidence in the Knowsley Town Centres and Shopping Study (EB12 & EB13). In this regard, it should be noted that the policy approach is consistent with the extant outline planning permission for a mixed use development to comprehensively regenerate Kirkby Town Centre including retail expansion to the south of Cherryfield Drive, which was granted in 2011.

69/1069.2/ CS6

Mr J R Harrison

West Lancashire Borough Council

Plan
Order.ID

Spatial Strategy

Support

WR - Written Representation

207

**Summary of
Main Issues**

Welcome approach within Policy CS6 which reflects a reduced capacity for retail floorspace in Kirkby town centre, ensuring that the regeneration of Kirkby and Skelmersdale town centre can co-exist without threatening one another's viability.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Noted and welcomed.

67/1067.1/ CS6 / LC

Mr Marcus Hudson

Lancashire County Council

Plan
Order.ID

Spatial Strategy

Support

WR - Written Representation

207

**Summary of
Main Issues**

Reassessment of policies relating to the size and location of retail provision in Kirkby (Policy CS6 and CS10) has resulted in the consideration that the reduced amount of comparison goods floor space proposed for Kirkby is acceptable, and will not detrimentally affect the proposed regeneration of Skelmersdale town centre.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Noted and welcomed.

Spatial Strategy

Objection

AE - Attending Examination

229

**Summary of
Main Issues**

- Broad support for the provisions of Policy CS7
- Policy CS7 approach to the proposed requirement to include emerging technologies within all new developments is not justified or based on any locally prepared evidence
- Policy approach is not effective as Policy CS7 (2) (e) is too vague and could prevent the delivery of development on viability grounds
- Policy CS7 is not consistent with national policy as Policy CS7 (2) (e) fails to ensure viability and deliverability in accordance with the NPPF, mis-states S35 and is not consistent with S154 in terms of how a decision maker should react to a development proposal

**Summary of
Suggested
Changes**

- Policy CS7 Part (2) (e) should be removed

**Council
Response:**

The Council supports its policy approach as sound and legally compliant. As a consequence, it is considered that the suggested change is not necessary or appropriate

Spatial Strategy

Support with Amends

WR - Written Representation

229

**Summary of
Main Issues**

Consideration and investigation should be made into the improvement of all traffic and transport links within Halewood in meeting the needs of the existing and new residential community.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council considers that issues of transport and traffic are addressed in Policy CS7 and the Council's evidence base.

**Summary of
Main Issues**

The preparation of the Local Plan should be fully interlinked with the Local Transport Plan, including ensuring:

- Development is located in accessible locations, including near bus corridors and railway stations
- Development should be based around the need for access of all forms of transport
- Parking is managed in new development
- Developers contribute to the cost of public transport access in areas not well served by existing services
- Development should be sustainable and account for impacts of climate change and air pollution.

Clear policy support should be provided for:

- Protecting Merseytram Line 1 to Kirkby
- Delivery of a new railway station and facilitating development at Headbolt Lane, Kirkby
- Electrification of from Kirkby to Skelmersdale / Wigan and a new rail line and station to serve Skelmersdale
- Electrification of the Liverpool to Wigan and Liverpool to Manchester railway lines;
- Quadrupling or the rail line between Broadgreen and Huyton.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Consider that these general comments have been addressed in the Plan, in particular Policy CS7.

119/1119.8/ CS7 / S 2 3 4

Mr Peter Ryan

Taylor Wimpey UK Ltd

Plan
Order.ID

Spatial Strategy

Objection

AE - Attending Examination

229

**Summary of
Main Issues**

- Requirements to seek to reduce carbon emissions should be subject to a viability / appropriate circumstances caveat
- Specificity around the technologies considered appropriate to reduce carbon emissions is required, policy wording of the current nature is untested, not reflective of guidance in the NPPF and could prove unnecessarily costly to implement
- Developer contributions should only be "where necessary" to meet national policy requirements

**Summary of
Suggested
Changes**

- A caveat confirming that all measures, particularly point 1 (e) are 'subject to economic viability testing' and / or 'in appropriate circumstances' to ensure consistency with national policy.
- Amend Point 4 to start with 'Where necessary'.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant. As a consequence, the Council does not consider that the suggested changes are necessary or appropriate.

118/1118.1/ CS7 / S 3

Mr Marcus Scrafton

Vantage Airports UK

Plan
Order.ID

Spatial Strategy

Objection

AE - Attending Examination

229

**Summary of
Main Issues**

- Welcome support for the proposed expansion plans for Liverpool John Lennon Airport and Liverpool Superport and the importance these projects have at a local, regional and national level to ensure economic investment in the Borough
- The recognition of the initiatives and opportunities of the Atlantic Gateway initiative are also supported
- Liverpool John Lennon Airport is able to offer services to provide handling for freight and cargo operations within the North West - in support of this Knowsley should encourage the use of this mode of transport when promoting new freight and logistics opportunities

**Summary of
Suggested
Changes**

- Knowsley should encourage the use of Liverpool John Lennon Airport's services to provide handling for freight and cargo when promoting new freight and logistics opportunities.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant, and considers that the suggested change is not necessary given the broader context of support for Liverpool John Lennon Airport within the policy.

17/1017.10/ CS7

Mr Edward Bean

Plan
Order.ID

Spatial Strategy

Support

WR - Written Representation

229

Summary of Main Issues Support for Policy CS7, including the pledge to work with partners to deliver schemes that support Local Transport Plan priorities. Particularly important is the ongoing support for the delivery of Merseytram Line 1.

Summary of Suggested Changes n/a

Council Response: Welcomed.

118/1118.2/ CS7

Mr Marcus Scrafton

Vantage Airports UK

Plan
Order.ID

Spatial Strategy

Support with Amends

AE - Attending Examination

229

Summary of Main Issues - Support for the Potential Eastern Access Transport Corridor, welcome the recognition of the proposals having a wider highway capacity role, in addition to serving John Lennon Airport
- Strongly agree that further transport infrastructure is required in order to support future expansion of the Airport and locality

Summary of Suggested Changes - Vantage and Peel would welcome the opportunity for further discussions with the Council in respect of the evolving Core Strategy, the expansion of Liverpool John Lennon Airport and the delivery of the Eastern Access Transport Corridor

Council Response: The Council supports its policy approach as sound and legally compliant, and therefore welcomes the comments.

118/1118.3/ 5.86 CS7 / S 3

Mr Marcus Scrafton

Vantage Airports UK

Plan
Order.ID

Spatial Strategy

Objection

AE - Attending Examination

238

Summary of Main Issues - In relation to Aviation Safeguarding, Policy CS7 needs further expansion to acknowledge that as part of CAA requirements, all wind turbine development within the Knowsley area must be consulted on with the Airport.

Summary of Suggested Changes - Further expansion to Policy CS7 acknowledge that as part of CAA requirements, all wind turbine development within the Knowsley area must be consulted on with the Airport.

Council Response: The Council supports its policy approach as sound and legally compliant, and considers that the suggested change is not necessary given the reference to a 30km consultation zone for wind turbine development.

104/1104.8/ CS8 / LC

Taylor Wimpey Homes UK Ltd & Redrow Homes Plc.

Plan
Order.ID

Spatial Strategy

Support

AE - Attending Examination

240

Summary of Main Issues - Broadly support the wording which seeks to protect, manage and / or enhance Knowsley's existing Green Infrastructure
- Broadly support the approach to Green Infrastructure and New Development provided that the measures required are not of a scale that threaten the viability of the development

Summary of Suggested Changes n/a

Council Response: The Council supports its policy approach as sound and legally compliant, notes that flexibility in terms of economic viability is provided at Policy CS27 and therefore welcomes this comment.

119/1119.9/ CS8 / S 2 3 4

Mr Peter Ryan

Taylor Wimpey UK Ltd

Plan
Order.ID

Spatial Strategy

Objection

AE - Attending Examination

240

**Summary of
Main Issues**

- Requires amendment to accord with NPPF, regarding the protection of biodiversity features.

**Summary of
Suggested
Changes**

- Amend Policy CS8 point 6 (c) to 'Protect important features and where possible maintain, replace and enhance the area's overall biodiversity characteristics through the provision of space for nature within and around the development'.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant. As a consequence, the Council does not consider that the suggested changes are necessary or appropriate.

92/1092.2/ 6.7 APR / S 1 2 3

Mrs Shirley Stankowski

Old Hall Estates Resident Group

Plan
Order.ID

Area Priorities

Objection

AE - Attending Examination

259

**Summary of
Main Issues**

- The Council explain in Para. 2.16 that Public Administration, Education and Health forms a large part of the Borough's economy - Para. 6.7 explains that this is all located in Huyton
- The transfer of more than 1,200 staff from Kirkby to Huyton is likely to have cost the Kirkby Town Centre economy up to £1.500m a year since the transfer began in 1992

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council notes the comments, but consider that they do not raise soundness or legal compliance issues in terms of policy approaches within the Local Plan.

17/1017.11/ CS9

Mr Edward Bean

Plan
Order.ID

Area Priorities

Support

WR - Written Representation

263

**Summary of
Main Issues**

Support for Policy CS9.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Noted.

9/1009.6/ CS9

Matthew Robinson

HOW Planning

Plan
Order.ID

Area Priorities

Support with Amends

WR - Written Representation

263

**Summary of
Main Issues**

- Support for Policy CS9, subject to highlighting the need for residential development on an element of the remaining land at King's Business Park in order to cross subsidise future employment development.

**Summary of
Suggested
Changes**

- Highlighting the need for residential development on an element of the remaining land at King's Business Park in order to cross subsidise future employment development.

**Council
Response:**

The Council considers it has incorporated sufficient flexibility within its approach to safeguarding employment land, and consideration of such land for other uses with regard to development viability. The Council does not consider that soundness or legal compliance issues have been raised to merit changes to Policy CS9.

119/1119.10/ CS9 / S 2 3 4

Mr Peter Ryan

Taylor Wimpey UK Ltd

Plan
Order.ID

Area Priorities

Objection

AE - Attending Examination

263

**Summary of
Main Issues**

- Support given for regeneration of North Huyton and Stockbridge Village
- Policy should reflect wider objectives for the area, including release of land at Edenhurst Avenue (Green Belt Location 4) for housing, which will give rise to area benefits and help rebalance the housing stock in the area

**Summary of
Suggested
Changes**

- Policy should be enhanced and adopt a more positive and direct approach, and reflect the wider objectives for the area to accord with Para 6.8, including reference to the release of land at Edenhurst Avenue.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant. Furthermore it should be noted that Policy CS9 is specific to the areas of North Huyton and Stockbridge Village and is therefore not intended to directly translate the broader priorities for Huyton, including Land at Edenhurst Avenue, as listed at Para 6.8. As a consequence, the Council does not consider that the suggested changes are necessary or appropriate.

72/1072.9/ 6.16 APR / LC

The Knowsley Estate

Plan
Order.ID

Area Priorities

Support

WR - Written Representation

270

**Summary of
Main Issues**

Support for the identification of land at Knowsley Lane (Location 3) for release from the Green Belt. This site should come forward in the early stages of the plan period as its development will have a significant and positive impact on plan objectives.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Noted. The Council's approach to phasing of potential release of reserved Green Belt locations is justified through the Council's evidence base.

17/1017.12/ 6.19 APR

Mr Edward Bean

Plan
Order.ID

Area Priorities

Support

WR - Written Representation

273

**Summary of
Main Issues**

Support for aspect of Area Priorities for Kirkby relating to ensuring transport improvements in the township area.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Welcomed.

66/1066.2/ CS10

Mr David Robinson

Sefton Council - Planning Services

Plan
Order.ID

Area Priorities

Support

WR - Written Representation

276

**Summary of
Main Issues**

Noted that Knowsley Council propose an expansion of Kirkby town centre which will include a new superstore. This is unlikely to harm Bootle town centre.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Noted.

Area Priorities

Support

WR - Written Representation

276

**Summary of
Main Issues**

Reassessment of policies relating to the size and location of retail provision in Kirkby (Policy CS6 and CS10) has resulted in the consideration that the reduced amount of comparison goods floor space proposed for Kirkby is acceptable, and will not detrimentally affect the proposed regeneration of Skelmersdale town centre.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Noted and welcomed.

Area Priorities

Objection

WR - Written Representation

284

**Summary of
Main Issues**

- Policy CS11 text is not sufficiently clear as to where the “gateway” locations are. Lees Road should be included so that it is clearer that Academy Business Park is a “gateway location” with further clarification in the Local Plan: Site Allocations and Development Policies

- Agree with the need for a local service centre at Knowsley Industrial Park, there is little justification for it to be specifically located at South Boundary Road – Academy Business Park (plan attached REF) could provide a suitable location for small scale shopping and services to serve the needs of the work force and would be a sustainable location which is highly visible, accessible and suitable for these uses

**Summary of
Suggested
Changes**

- Specify Lees Road as a “gateway” location in Policy CS11 Part (1) (a)

- Amend text in Policy CS11 Part (1) (d) to remove reference to South Boundary Road and replace with land bounded by Lees Road / County Road and Arbour Lane. Para. 6.27 would also need to be amended accordingly.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant. Appropriate explanation and justification for the priorities in the Local Plan are included within the Delivering a New Future for Knowsley Industrial Park – Strategic Framework (EB17). As a consequence the suggested changes are not necessary.

12/1012.3/ CS12

Ms Deborah McLaughlin

Homes and Communities Agency

Plan
Order.ID

Area Priorities

Support

WR - Written Representation

292

**Summary of
Main Issues**

- Support for the inclusion of Tower Hill as a Principal Regeneration Area.
- Encouragement of new inward investment in Tower Hill to ensure housing delivery and economic growth, and the creation of a sustainable community.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Comments welcomed.

100/1100.5/ CS12 / LC

Ms Lindsay Grey

NV Assets

Plan
Order.ID

Area Priorities

Support

WR - Written Representation

292

**Summary of
Main Issues**

- The regeneration of the Tower Hill area will complement the proposed development of the Bank Lane, Kirkby site for market housing and will generally be beneficial to this part of Kirkby.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The comments are noted and present no soundness or legal compliance issues.

Area Priorities

Objection

AE - Attending Examination

301

**Summary of
Main Issues**

- It is considered that reference to land "South of Whiston" and "Cronton Colliery and adjacent land" as a strategically important gateway development should be included in the Area Priorities box for Prescot, Whiston, Cronton and Knowsley Village.

- It is considered that paras 6.43-6.45 would be an appropriate place for a new policy dealing with the suggested strategic site allocation at "South of Whiston" and "Cronton Colliery and adjacent land".

**Summary of
Suggested
Changes**

- Add following to Paragraph 6.45 - 'To provide strategically important gateway development of mixed housing and employment to land off Junction 6 of the M62'

- Add new policy at Paras 6.43 - 6.45 relating to a strategic site allocation at "South of Whiston" and "Cronton Colliery and adjacent land".

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), Technical Report: Planning for Housing Growth (TR01) and Technical Report: Planning for Employment Growth (TR02) relating to housing and employment requirements, as supported by evidence in the Green Belt Study (EB08), Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04), Joint Employment Land & Premises Study (EBO7) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested changes are necessary, noting that Policy CS5 ensures sufficient flexibility for appropriate Green Belt release to deliver the required development during the plan period and beyond.

Area Priorities

Objection

AE - Attending Examination

303

**Summary of
Main Issues**

- The references to "review" the Green Belt boundary and to "longer term" development needs in the fourth bullet of "Area Priorities" are inappropriate. The Local Plan evidence base demonstrates that sites do need to be released from the Green Belt, if the Council is to meet housing objectives. A further Green Belt review is not necessary.

- There should be no implied timescale on bringing forward Green Belt sites for housing. They are needed as soon as the supply dips below five years (plus 20%). Based on past under-delivery, sites may be needed in the immediate / short term to ensure they is a continuous five year supply of deliverable housing land.

**Summary of
Suggested
Changes**

- The fourth bullet should be amended to read "... to release sites from the Green Belt boundary to meet development needs..."

**Council
Response:**

The Council's approach clarifies that Green Belt land will be required to meet development needs within the plan period, and is informed by evidence including Technical Reports and the Green Belt Study. To release sites any sooner than set out through the phasing mechanism in Policy CS5 would be contrary to wider plan objectives. The Council considers it appropriate to undertake strategic Green Belt review with partners across Merseyside to meet post-plan period needs in due course.

Area Priorities

Support

WR - Written Representation

303

**Summary of
Main Issues**

Support for:

- the identification of Prescott, Whiston, Cronton and Knowsley Village as an area priority
- the principle of Green Belt boundary review to meet longer term development needs, including the broad location identified at Knowsley Village
- the identification of the historic and recreational significance and contribution of the Knowsley Hall Estate and Safari Park.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Noted and welcomed.

Area Priorities

Objection

AE - Attending Examination

306

**Summary of
Main Issues**

- It is accepted that land at Carr Lane will form part of South Prescott Principal Regeneration Area. The regeneration objectives for the Principal Regeneration Area can be facilitated by early release of Carr Lane for development as there are no significant impediments to developing this site.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), Technical Report: Planning for Housing Growth (TR01) and Technical Report: Planning for Employment Growth (TR02) relating to housing and employment requirements, as supported by evidence in the Green Belt Study (EB08), Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04), Joint Employment Land & Premises Study (EB07) and Economic Viability Assessment (EB06).

Area Priorities

Objection

WR - Written Representation

314

Summary of Main Issues - Query whether betterance of Prescott Town Centre into Sewell Street will involve more land from the Parish Church to widen Market Place.

Summary of Suggested Changes n/a

Council Response: The Council supports its strategic policy approach to Prescott Town Centre as sound and legally compliant. In this regard, such site level details are considered to be a matter for determination within the Local Plan: Site Allocations and Development Policies document rather than the Local Plan: Core Strategy.

Area Priorities

Objection

AE - Attending Examination

314

**Summary of
Main Issues**

- The highly sustainable location of Cables Retail Park, its accessibility and proximity to Prescot Town Centre, the role it plays in local employment and the overall retail offer and expenditure retention of Prescot justifies its inclusion within the defined Prescot Town Centre shopping provision and Primary Shopping Area.
- Providing the Retail Park with Town Centre shopping provision status will provide support for the Retail Park to evolve as a retail destination and strengthen Prescot town centre's overall retail offer, preventing unsustainable trade loss and travel patterns.
- Allocating the Retail Park as part of the Town Centre shopping provision will provide better opportunities for links as if the two locations cannot be disaggregated in policy terms, there must by default be better opportunities for links.

**Summary of
Suggested
Changes**

- Request that Cables Retail Park be included as part of the defined Prescot Town Centre shopping provision in the Core Strategy and any Development Plan Documents which will set the boundaries for all centres in Knowsley.
- Request that Cables Retail Park be included within the Primary Shopping Area for Prescot.
- Recognise at Paragraph 2.23, the third bullet at Paragraph 6.44 and Paragraph 6.60 that the Retail Park forms a key part of the overall retail offer of Prescot Town Centre.
- Suggest at Policy CS14 2. – 'restructuring of retail provision within Cables Retail Park will be supported.'
- Remove Paragraphs 6.57 and 6.58 – do not assist the ability for Cables Retail Park to assist the town centre's retail offer.
- Recognise at Paragraph 6.59 that 'Extending the boundary of the town centre to include Cables Retail Park will better reflect the overall retail function of the town centre and retail park'.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Planning for Retail in Knowsley (TR04), as supported by evidence in the Knowsley Town Centres and Shopping Study (EB12 & EB13). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate, noting Cables Retail Park is more suitably identified as an edge of centre location in accordance with NPPF Para. 23.

118/1118.4/ 6.64, 6.65 APR

Mr Marcus Scrafton

Vantage Airports UK

Plan
Order.ID

Area Priorities

Support

AE - Attending Examination

325

**Summary of
Main Issues**

- Support for the expansion of the Airport and Eastern Access Transport Corridor is welcomed.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council supports its policy approach as sound and legally compliant, and therefore welcomes the comments.

104/1104.9/ 6.65 APR / LC

Taylor Wimpey Homes UK Ltd & Redrow Homes Plc.

Plan
Order.ID

Area Priorities

Support

AE - Attending Examination

326

**Summary of
Main Issues**

- Broadly support the Council's objectives to review the Green Belt boundary East of Halewood, to provide an appropriate range of new residential developments in Halewood and to improve the quantity, quality and accessibility of existing local greenspace
- Consider that the Green Belt boundary review at the two locations to the East of Halewood (Location 7) provides the most sustainable location for development to meet housing needs in the Halewood area

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council supports its policy approach as sound and legally compliant, and therefore welcomes this comment.

**Summary of
Main Issues**

- There should be support for the development of rail freight terminals at Knowsley Industrial Park in Kirkby and the Jaguar Land Rover Car Plant in Halewood.

**Summary of
Suggested
Changes**

- A reference to the Jaguar Land Rover freight terminal should be given in paragraph 6.65, Area Priorities for Halewood.

**Council
Response:**

Consider no soundness or legal compliance issues raised. Importance of Jaguar Land Rover to Halewood is already sufficiently emphasised. Suggested change is minor in nature.

Area Priorities

Objection

AE - Attending Examination

326

**Summary of
Main Issues**

- Very surprising there is no specific policy for the Halewood area.
- The distribution of development provided within the Borough requires further consideration, and this should lead to more development at Halewood.
- The spatial portraits previously included have not been carried forward from Preferred Options, the issues included are now more negative and do not recognise the positive characteristics of the township.
- Easy to conclude therefore, that rather than formulating a spatial strategy which responds to and addresses the characteristics and requirements of the place, the Council has adjusted its presentation of the evidence to fit what it has decided for other reasons that it is prepared to do. Far from planning positively the Council is actually planning negatively.
- The matters stated need to be acknowledged in coming to an understanding of Halewood and the needs of its community in the future. It is for the plan to go on to indicate what role is intended in Halewood - as in all parts of the Borough - for the future and how this role is assisted through matters over which the plan has an influence.
- The recognisable characteristics displayed in Halewood continue to indicate that a significant part of the development taking place in the Borough ought to be in Halewood. Additional well planned and integrated development would assist in addressing the issues, opportunities and priorities set out in paragraph 6.65.
- The Council has not followed the Housing Technical Report recommendation that 'Halewood has a consistent shortage of housing land, and consequently a larger amount of land will be required to maintain its current proportion of the Borough population'.
- Maintaining a proportionate level of growth would hardly amount to a strategy, in the sense that there is no conscious shift in the existing situation proposed to address what the evidence says about parts of the Borough at present, or to help bring about any particular role for Halewood in the future.
- It seems entirely possible that within the plan period further employment land will need to be found in Halewood. If so, the broad locations already identified in the Core Strategy would be the likely source of this land through mixed use urban extensions, and as a consequence further land will be required to make up even the housing provision that the Council seeks to make.

**Summary of
Suggested
Changes**

- The plan needs a policy for Halewood which provides a proper strategy for the area and identifies appropriate development sites, bringing the approach into line with the plan's handling of the other townships and would be a significant improvement to the plan.
- Strongly suggest that a greater proportion of the plan's Borough housing provision should be directed to Halewood than would simply maintain the existing pattern.
- The land promoted through these representations (Land at Lydiate Lane, Halewood) should be made available in this plan period to provide greater flexibility in the strategy, as well as to increase the amount of housing that can be delivered in the early stages of the plan and for the plan period as a whole.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), Technical Report: Planning for Housing Growth (TR01) and Technical Report: Planning for Employment Growth (TR02) relating to housing and employment requirements, as supported by evidence in the Green Belt

15/1015.2/ 6.65 APR

John Green

Halewood Town Council

Plan
Order.ID

Area Priorities

Support with Amends

WR - Written Representation

326

**Summary of
Main Issues**

Consideration of land for housing developments should see the previously developed former Bridgefield Forum site given priority over any other land in Halewood.

Consideration and investigation should be made into the improvement of all traffic and transport links within Halewood in meeting the needs of the existing and new residential community.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The priority to promote previously developed sites for new residential development is reflected in policies CS2 and CS3. The Area Priorities for Halewood emphasise the need to provide an appropriate range of new residential development. The Council is content that its phasing mechanism prioritises development in the urban area, including on previously developed sites such as Bridgefield Forum. Issues of transport and traffic are addressed in Policy CS7 and the Council's evidence base.

**Summary of
Main Issues**

- The proposed requirement for 25% affordable housing on all sites (subject to viability) is too broad brush an approach and inconsistent with national policy (NPPF Para. 50) as it does not sufficiently take account of the objective to re-balance the housing market in the Borough.

- The site at Bank Lane, Kirkby a reserved location for housing development, is being promoted as a Gateway Site for market housing which will complement the regeneration of the adjacent Tower Hill area. In these circumstances, it is unreasonable and illogical to require an affordable housing element within the Gateway site such dwellings will be provided in the adjacent regeneration area.

**Summary of
Suggested
Changes**

- An additional criterion should be added to the existing seven criteria in Policy CS15; 'In those circumstances where a site is delivering a quality and type of market housing which will demonstrably assist in the objective of re-balancing the housing market in the Borough, a lower or nil affordable housing contribution will be permitted'.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant. Appropriate explanation and justification of the affordable housing requirement are included within the Technical Report: Planning for Housing Growth (TR01), as supported by evidence in the Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04) and Economic Viability Assessment (EB06). As a consequence the suggested changes are not necessary.

Balancing the Housing Market

Objection

AE - Attending Examination

332

**Summary of
Main Issues**

- Not positively prepared as it would reduce the total amount of affordable housing coming forward.
- It is not properly justified by evidence and is not the most appropriate strategy.
- It would not be effective as it is not fully deliverable.
- It is accepted that a 25% affordable housing target may be achievable in “normal” market conditions on greenfield sites with no large infrastructure or abnormal costs, however this target would impede the deliverability of previously developed land, especially in lower value areas.
- Policy CS15 should recognise the differences in viability between different areas and types of site.
- There is no requirement in national policy that all affordable housing be made available in partnership with Registered Providers.

**Summary of
Suggested
Changes**

- Recognise in Policy CS15 the differences in viability between different areas and site types.
- Policy CS15 1 (f) should be amended to remove any requirement that all affordable housing must be made available in partnership with Registered Providers.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Planning for Housing Growth (TR01) relating to affordable housing requirements, as supported by evidence in the Strategic Housing Market Assessment (EB04) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate, noting that Policy CS15 1 (a) incorporates flexibility relating to development viability.

Balancing the Housing Market

Objection

AE - Attending Examination

332

**Summary of
Main Issues**

- Broadly support Policy CS15, including the provision of a minimum of 25% affordable housing on all sites which have a capacity of 15 dwellings or more across, noting the wording allows for developers to provide a lower proportion of affordable housing where economically viability issues are clearly demonstrated
- Agree that affordable housing contributions be negotiated on a site by site basis
- Need to consider the delivery of affordable homes for the elderly, young people and first buyers through provision of discounted affordable rented units and the requirements of other types of affordable housing such as that targeted at first time buyers (NewBuy)
- Object to the expectation that all new affordable homes should comply with all the provisions of Policy CS17 as the requirement to be built to Buildings for Life, Lifetime Homes and Code for Sustainable Homes is not justified or effective as it is not deliverable and is likely to render schemes unviable

**Summary of
Suggested
Changes**

- Delete the requirement for all affordable homes to be built to Buildings for Life, Lifetime Homes and Code for Sustainable Homes standard
- Include affordable rented units and NewBuy as mechanisms for delivering affordable housing in the Borough

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Planning for Housing Growth (TR01) relating to housing requirements, as supported by evidence in the Strategic Housing Market Assessment (EB04) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate.

**Summary of
Main Issues**

- Support for the Council's priority to deliver new affordable housing through direct investment as part of the Affordable Housing Programme.
- Support for the inclusion of a flexible policy when determining affordable housing requirements, including viability assessments.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Comments welcomed

**Summary of
Main Issues**

Objection to Policy CS15 as it is based on misassumptions and unrealistic scenarios, including:

- It is not properly informed by the message emanating from the prepared viability evidence
- Incorrect assumptions in evidence regarding the appropriate level of developer profit and revenues to be achieved from affordable rented units, which render judgments regarding viability invalid

Objection to the level of affordable housing in the policy. This should be reduced, due to:

- The level being In conflict with the NPPF
- Its implementation resulting in much of the housing land supply being unviable
- Its implementation resulting in the need for continual site by site viability assessments being undertaken

**Summary of
Suggested
Changes**

The affordable housing target should be reduced

**Council
Response:**

The Council considers that its approach within Policy CS15 is sound, being based on robust evidence and reflective of the guidance within the NPPF.

Balancing the Housing Market

Objection

AE - Attending Examination

332

Summary of Main Issues - Question whether market housing schemes will be deliverable if 25% affordable housing provision is sought.
- A figure of 15% should be included to ensure that sites are delivered.

Summary of Suggested Changes The affordable housing requirement should be changed from 25% to 15% on developments which have a capacity of 15 dwellings or more.

Council Response: The Council considers that its approach to affordable housing requirements is justified through evidence including the Economic Viability Assessment. Sufficient flexibility is also incorporated in the policy through a clause relating to development specific viability evidence.

**Summary of
Main Issues**

- Exceptional circumstances when off site contributions may be appropriate should be provided as examples to make policy more effective
- Policy should contain caveat that affordable housing requirements could be altered to reflect consistent inability by developers to viably meet targets, due to the housing market to ensure consistency with national policy in terms of flexibility relative to market conditions

**Summary of
Suggested
Changes**

- List a number of 'exceptional circumstances' as examples of when off site contributions might be acceptable
- Provide a caveat within the policy which allows alteration of the affordable housing target through Supplementary Planning Policy or a Housing Strategy Paper

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Planning for Housing Growth (TR01) relating to housing requirements, as supported by evidence in the Strategic Housing Land Availability Assessment (EB01) and Strategic Housing Market Assessment (EB04). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate, particularly as the affordable housing target already includes appropriate flexibility to account for viability considerations, and additional detail on exceptional circumstances when off site contributions may be appropriate can be included in a Planning Obligations SPD if appropriate.

Balancing the Housing Market

Objection

AE - Attending Examination

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**Summary of
Main Issues**

- The assessment of need in the SHMA (EB04) is out of date – the shortfall is calculated from the 2007 Housing Needs Study (EB05) data – annual level of demand and supply is assumed to apply each year to 2012 when new primary data is required

- SHMA also advises that the percentage scale and tenure mix target levels will require to be ratified by an Affordable Housing Viability Assessment – an assessment undertaken on behalf of the Council has identified that at 30 dpha, the provision of 25% on-site affordable housing is not viable in the urban areas of Kirkby, North Huyton and Halewood and that within smaller schemes it is still not viable at 15%. The proposed policy approach therefore cannot be delivered and fundamentally undermines the viability and deliverability of the majority of new developments, contradicting the need for viability testing identified in the SHMA.

**Summary of
Suggested
Changes**

- Policy CS15 should be reviewed to meet the requirements of the viability assessment.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Planning for Housing Growth (TR01) relating to housing requirements, as supported by evidence in the Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested change is necessary or appropriate, noting that the policy approach to affordable housing requirements incorporates necessary flexibility for market change, whilst not restricting deliverability in circumstances where viability may otherwise be challenged.

Balancing the Housing Market

Objection

AE - Attending Examination

337

**Summary of
Main Issues**

- The proposed tenure split in para. 7.8 is too weighted towards the provision of rented accommodation.
- A 50/50 split between affordable rent and intermediate housing would be more appropriate, especially as it would balance the housing offer of the Borough.

**Summary of
Suggested
Changes**

- A 50/50 split between affordable rent and intermediate housing.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Planning for Housing Growth (TR01) relating to affordable housing requirements, as supported by evidence in the Strategic Housing Market Assessment (EB04) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate.

Balancing the Housing Market

Objection

AE - Attending Examination

347

**Summary of
Main Issues**

- Broadly support the provisions seeking to develop an appropriate mix of housing
- Object to Policy CS17 Part (4) as the inclusion of low carbon requirements such as the Code for Sustainable Homes Standard, Building for Life standards and Lifetime Homes design criteria are outside of planning control and the approach is not based on a robust and justified evidence base, is too vague and overly prescriptive and could prevent delivery of development on viability grounds
- Policy CS17 is not based upon national policy as it fails to ensure viability and deliverability in accordance with the NPPF (173-174)

**Summary of
Suggested
Changes**

- Delete the reference to the requirement for development to incorporate Code for Sustainable Homes Standard, Building for Life standards and Lifetime Homes design criteria

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Planning for Housing Growth (TR01) relating to housing requirements, as supported by evidence in the Strategic Housing Market Assessment (EB04) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested change is necessary or appropriate.

Balancing the Housing Market

Objection

AE - Attending Examination

347

**Summary of
Main Issues**

- The Core Strategy should not impose construction and sustainability standards in excess of national policy as they result in additional costs on development and there is no local justification for their requirement.
- Not positively prepared as it would reduce the total amount of affordable housing coming forward.
- Not properly justified and is not the most appropriate strategy.
- Not effective as it is not fully deliverable.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification relating to housing requirements within the Technical Report: Planning for Housing Growth (TR01), as supported and justified by evidence in the Strategic Housing Market Assessment (EB04) and Economic Viability Assessment (EB06). The Council has also included sufficient flexibility for negotiation relating to development viability within Policy CS27.

Balancing the Housing Market

Support

WR - Written Representation

347

**Summary of
Main Issues**

- The policy is consistent with national planning policy guidance.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council supports its policy approach as sound and legally compliant, and therefore agrees with the views expressed in this representation.

Balancing the Housing Market

Objection

AE - Attending Examination

350

**Summary of
Main Issues**

- Unclear whether Table 7.1 is part of the policy or guidance. The evidence base that underpins it is out of date and the table is also too prescriptive and unnecessary, as the market will inevitably provide housing to meet the needs of the area. It is also likely to affect viability and deliverability
- Policy CS17 Part (2) is a duplication of Policy CS3, the requirements are unnecessary and it is unclear what a developer would have to do to demonstrate compliance
- Policy CS17 Part (3) is unclear what a 'smaller residential development' might be and how this requirement to provide a 'mix of housing sizes' relates to requirements under Part (2). It is also unclear how this might always be appropriate when some smaller sites might be better suited to a single size of accommodation
- The Council's own viability assessment indicates that implementation of Building for Life Standards and Lifetime Homes would also not be achievable for small and medium sized schemes in Zones 1 and 2
- The requirement to achieve Building for Life standards is in any event unclear as it is not apparent "what government policy" is in this regard, or what the requirements of the Policy are – if it duplicates Government policy it is unnecessary and it is unreasonable to require compliance with a set of standards produced by a third party which change over time and the consequences of which cannot be fully understood when formulating the policy. There are sites where it is not possible to meet these standards due to the matters specific to any one site and therefore the rigid requirement to meet these standards is not reasonable or enforceable
- Policy CS17 Parts (4) (c) and (d) duplicate other policies and are therefore unnecessary

**Summary of
Suggested
Changes**

- An indication of affordable housing sizes would be better located as part of Policy CS15
- Remove duplication with other policies
- Amend rigid requirement to meet Building for Life and Lifetime Homes Standards

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Planning for Housing Growth (TR01) relating to housing requirements, as supported by evidence in the Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate

**Summary of
Main Issues**

- Consider the prescriptive nature of the policy relating to dwelling size split to be unnecessary and counterproductive to achieving a balanced mix of housing across the Borough
- The market is quicker to respond to demand than the planning process so the level of control on supply and delivery is likely to be unsuccessful and constrain market delivery
- Delivery of apartments at 10% on many sites will not be economically viable and such as proportion is more likely to come forward as small scale windfall.
- Demonstrating compliance with listed design standards may be onerous and is not justified

**Summary of
Suggested
Changes**

- Clarification required that the exact percentages of dwelling types do not have to be met by all developments over 15 dwellings
- Caveat regarding "in appropriate circumstances" needed for requirement relating to design standards in Policy CS17 Point 4.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Planning for Housing Growth (TR01) relating to housing requirements, as supported by evidence in the Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate.

Summary of Main Issues Knowsley MBC should undertake a thorough assessment to ascertain pitch requirements for Gypsies and Travellers and Travelling Show People in the Borough.

Summary of Suggested Changes n/a

Council Response: Comments welcomed.

**Summary of
Main Issues**

- Provides no policy to address the requirement of the NPPF in relation to unstable land and mining legacy.
- The Core Strategy has not responded to requests for policy criteria requested at Issues and Options, and Preferred Options consultation stages.
- The Knowsley area has been subjected to coal mining which will have left a legacy, whilst most past mining is benign in nature, potential public safety and stability problems can be triggered and uncovered by development activities.
- Within Knowsley there are approximately 209 recorded mine entries and around 3 other recorded coal mining hazards along with other mining legacy features. Mine entries may be located in built up areas, often under buildings where the owners and occupiers have no knowledge of their presence unless they have received a mining report during a property transaction.
- Mine entries and mining legacy matters should be considered by the Local Planning Authority to ensure that site allocations and other policies and programmes will not lead to future public safety hazards.
- Although mining legacy occurs as a result of mineral workings it is important that new development delivered through the Core Strategy recognises the problems and how they can be positively addressed.
- Land instability and mining legacy is not a complete constraint on development; rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable.

**Summary of
Suggested
Changes**

- Amend CS19 to include reference to mining legacy; "address any issues of land instability, including that arising from mining legacy, to ensure that it is either removed or appropriately remediated through the development process."

**Council
Response:**

The Council notes the comments and suggested changes, however it should be noted that policy criteria have been alternatively added to Policy CS2 in response to previous consultation to provide a strategic approach to land quality (considered to include land instability, contaminated land, etc) and the legacy of minerals extraction. Furthermore it is intended that a more detailed approach and policy criteria will be provided through the Local Plan: Site Allocations and Development Policies document if necessary to replace the existing saved UDP policies ENV2 - ENV6. As a consequence it is not considered that the comments present soundness or legal compliance issues relating to Policy CS19 or the wider Local Plan.

Summary of Main Issues - The policy is consistent with national planning policy guidance.

Summary of Suggested Changes n/a

Council Response: The Council supports its policy approach as sound and legally compliant, and therefore agrees with the views expressed in this representation.

Promoting Quality of Place

Objection

AE - Attending Examination

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**Summary of
Main Issues**

- Broadly support the need to deliver high quality and inclusive design in new development
- Broadly support the requirement for new development to integrate sustainable design principles and energy efficient measures (subject to viability)
- Broadly support the specification that new development will be expected to respond to and integrate positive characteristics of immediate surroundings (subject to a degree of flexibility based on considerations such as local needs and the development proposals)
- Support the requirement to demonstrate community engagement on all major development proposals
- Object to the requirement for new development to integrate flood risk mitigation, Policy CS19 Part (3) (c). The wording suggests that all new development will be expected to incorporate flood risk mitigation; this is not based on a robust or justified evidence base and is beyond what is required by the NPPF

**Summary of
Suggested
Changes**

- Introduce a degree of flexibility to Policy CS19 to ensure those development which do not require flood risk mitigation measures are not required to integrate them.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant. Clarification of the specific Local Plan requirements in terms of managing flood risk and flood risk mitigation associated to development are included in Policy CS24. As a consequence, the Council does not consider that the suggested change is necessary or appropriate.

Promoting Quality of Place

Support

WR - Written Representation

376

Summary of Main Issues Support of Policy CS20 and supporting text.

Summary of Suggested Changes n/a

Council Response: Noted and welcomed.

Promoting Quality of Place

Objection

AE - Attending Examination

385

Summary of Main Issues - Object to the effectiveness of the onerous policy wording in Policy CS21 Part (10) (c), as the requirement to provide two replacement trees for every tree lost, taking account of species and size, is not deliverable. It is not always possible to provide two trees similar to every tree lost

Summary of Suggested Changes Reword Policy CS21 Part (10) (c) to start "Where possible"

Council Response: The Council supports its policy approach as sound and legally compliant, noting that it supports the Green Infrastructure and landscaping approaches in Policies CS8 and CS19 respectively, with adequate flexibility for viability considerations in the context of Policy CS27.

Promoting Quality of Place

Objection

AE - Attending Examination

385

**Summary of
Main Issues**

The boundary of the Knowsley Park Site of Biological Interest (SBI40) should be amended to exclude two parcels (plan attached - locations KO19 and KO23) which are within the Green Belt location (Location 10) identified for safeguarding, due to:

- the sites being determined in 2003 as "buffer zones" to the SBI and as winter feeding grounds for Pink Footed Geese
- no further ecological assessments have been undertaken
- the sites are sited some distance from the central attractions for wildlife within the Park Estate
- the current designation of the sites as buffer zones is now considered inappropriate
- the likelihood of the sites containing features of a substantive nature conservation value is remote
- Merseyside EAS have confirmed the areas do require further consideration as to their inclusion within the Local Site.

**Summary of
Suggested
Changes**

The boundary of SBI40 should be amended to follow the wall of Knowsley Park Estate, and exclude the two sites mentioned (plan attached).

**Council
Response:**

Noted. The Local Nature Partnership are consulting on a potential change in accordance with the evidence submitted, the Council will address this issue through the Local Plan: Site Allocations and Development Policies.

Spatial Strategy

Objection

WR - Written Representation

385

**Summary of
Main Issues**

- Welcome the Council's approach of not seeking to impose a definitive presumption against the warranted and beneficial development of urban greenspace, but concerns expressed that this is not adequately reflected in the current policy wording and its probable interpretation.
- Part 3 of the policy renders Part 2 meaningless and introduces major uncertainty in understanding how it is to be applied given significant harm is not defined and it includes potential special qualities which remain subjective.
- The approach set out in Part 3 undermines the main strategic purpose of Policy CS21 in enabling appropriate opportunities for its beneficial recycling and re-use to come forward and help meet wider policy objectives, including Strategic Objective 2, Policy CS1 and Policy CS3.
- Considerations addressed by Part 3 are not strategic and are matters for the general development management policies of the plan and weighing on merit in planning balance.
- The wording of Part 2(e) is unclear.

**Summary of
Suggested
Changes**

- Deletion of Part 3 recommended.
- Reword Part 2 (e) to: "Where the proposal relates to the loss of indoor or outdoor sports provision, there is no available evidence of future or continuing need for sports use, or alternatively only land incapable of forming a playing pitch or sporting facility is affected."

**Council
Response:**

The Council supports its policy approach as sound and legally compliant, in this regard it is necessary to provide criteria which ensures protection of greenspaces in terms of quality and value, as opposed to purely quantity, in accordance with the Greenspace Audit (EB21) and Playing Pitch Assessment & Strategy (EB22). As a consequence the suggested changes are not considered necessary and appropriate. This is also noting that the suggestion relating to Part 2 (e) results from the misinterpretation of the bullet point in isolation without regard to the defined scope of "loss of urban greenspace" as referred to at Policy CS21 (2).

Summary of Main Issues - Land at the former BICC Social Club should be designated as urban green space.

Summary of Suggested Changes - Land at the former BICC Social Club should be designated as urban green space.

Council Response: The Council considers that matters of detailed site allocation will be appropriately dealt with as part of the Local Plan: Site Allocations and Development Management.

**Summary of
Main Issues**

- Inconsistency of Council identification of housing land supply within Urban Greenspace and the lack of sports facilities in Kirkby
- Kirkby has undergone a non-stop programme of house building that leaves many areas without quality and accessible greenspace
- KRAG submitted alternative sites to the Call for Housing Sites in 2011 - KGV Playing Fields, Court Hey Park and Huyton Leisure Centre with all three sites excluded from the SHLAA on the grounds they are urban greenspace
- Policy decisions illustrate a clear inconsistency and possible discriminatory approach to provision of urban greenspace in the two areas

**Summary of
Suggested
Changes**

- Remove the All Saints School site from the SHLAA housing sites and include as part of Policy CS21
- Need to consider the suitability of the former Kirkby Sports Centre for housing in the context of shortfalls for team sports, and include the site under Policy CS21 rather than Policy CS3 to address the lack of community pitches for cricket, rugby league and union

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Planning for Housing Growth (TR01), as supported by evidence in the Strategic Housing Land Availability Assessment (EB01), Strategic Housing Market Assessment (EB04), Greenspace Audit (EB21), Playing Pitch Assessment & Strategy (EB22) and Economic Viability Assessment (EB06). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate.

**Summary of
Main Issues**

- To manage the protection / release of Urban Greenspace is appropriately justified, encourage the accurate monitoring of the supply and quality of such sites
- Where sites have been identified in the Local Plan for alternative uses, the assessment in Point 2 need not apply
- Accept removal of some trees which are damaged, diseased, pose a safety risk, etc.

**Summary of
Suggested
Changes**

- At Policy CS21 Part 2, add an additional criteria - 'The land has been identified for an alternative use within an adopted Development Plan Document'.
- At Policy CS21 Part 10, Add reference to the acceptance of removing trees which are either damaged, diseased or pose a safety risk.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate evidence and recommendations supporting the policy approach contained within the Greenspace Audit (EB21) and Playing Pitch Assessment & Strategy (EB22). As a consequence, the Council does not consider that the suggested changes are necessary or appropriate. In this regard, it should be noted that the suggestion for Point 2. remains premature to consideration of appropriate urban greenspace thresholds for identification as part of the Local Plan: Site Allocations and Development Policies document.

Summary of Main Issues	<ul style="list-style-type: none">- Broadly support Policy CS21- Concerns that the policy wording of bullet point 2 (e) as it is unclear whether it is referring to development which involves new sports provision or development which affects existing sports provision and would not appear to allow development in accordance with Para. 74 of the NPPF.
Summary of Suggested Changes	<ul style="list-style-type: none">- Recommend revised wording of bullet point 2 (e) that is consistent with NPPF Para.74.- Recommend an additional sentence below Table 8.2 to make clear that an excess of provision in any given area compared to the local standard would not in itself demonstrate an absence of need for a specific facility within that area.
Council Response:	<p>The Council supports its policy approach as sound and legally compliant, and considers that the representation results from the misinterpretation of the bullet point in isolation without regard to the defined scope of "loss of urban greenspace" as referred to at Policy CS21 2. As a consequence the suggested changes are not considered necessary or appropriate, particularly as Policy CS21 does not imply that quantitative standards of public open space are the only criteria to define areas of surplus.</p>

Promoting Quality of Place

Objection

AE - Attending Examination

392

**Summary of
Main Issues**

- The greenspace standards proposed in Table 8.1 are excessive and in excess of UDP requirements
- The greenspace standards proposed in Table 8.1 would have a detrimental impact on viability, especially on smaller brownfield sites.
- Not positively prepared as it would reduce the total amount of residential development coming forward, especially on brownfield sites.
- Not properly justified by evidence and is not the most appropriate strategy.
- Would not be effective as it is not totally deliverable.
- Not consistent with national policy.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council supports its policy approach as sound and legally compliant, with the requirements justified by evidence in the Council's Greenspace Audit (EB21), Playing Pitch Assessment and Strategy (EB22), Open Space, Recreation and Sports Needs Assessment and Strategy (EB23) and Economic Viability Assessment (EB06). In this regard, it is considered that the representation is mistaken in terms of reference to the proposed standards being in excess of UDP requirements noting that a reduction is sought from the quantity standards currently applied via the UDP and the associated Greenspace Standards and New Development SPD. The Council has also included sufficient flexibility for negotiation relating to development viability within Policy CS27 where contributions are required.

Summary of Main Issues - Support for the comprehensive provisions in Policy CS22 for energy efficiency and increased use of renewable and decentralised energy
- Welcome the introduction of the Allowable Solutions mechanism.

Summary of Suggested Changes n/a

Council Response: Supportive comments welcomed.

Caring for Knowsley

Objection

AE - Attending Examination

401

**Summary of
Main Issues**

- Policy CS22 Part (1) (a) – (j) are unclear how this will be applied to new developments and whether these requirements will apply to all developments
- Policy CS22 Part (2) is unclear what the Allowable Solutions will be and it is also clear that if it is not viable to incorporate these measures then unlikely to be viable to contribute to the fund – unnecessary to duplicate these controls within planning policy and the effect on the viability of individual development schemes is not clearly set out in the wording
- Prescriptive requirements to achieve different levels of the Code for Sustainable Homes and BREEAM are unreasonable and unnecessary – Government has indicated that they will be properly controlled through the Building Regulations. The Council's own viability assessment indicates that Code Level 3 and 4 is not achievable on smaller 'urban-previously developed sites' and urban-greenfield sites' located in Kirkby, North Huyton and Halewood, with Code Level 5 makes almost all development unviable
- Both BREEAM and Code for Sustainable Homes are generic standards which have been devised by third part organisations and are subject to regular alteration and amendment. It is not reasonable to require these standards to be achieved in a Core Strategy policy in advance of a national requirement, and will impact upon viability and deliverability
- Within Policy CS22 Part (10) it is not considered appropriate to set out in an SPD a charging mechanism for the Community Energy Fund as it will not allow the proper and full consultation and examination required of a Development Plan Document
- The requirement to demonstrate compliance with a wide ranging and vague policy is improbable task that is unnecessarily burdensome on applicants

**Summary of
Suggested
Changes**

- Aspirations rather than policy requirements within Policy CS22 1 Parts (a) - (j) should be taken out of the policy and placed within the supporting text
- Information on Allowable Solutions and the effect on the viability of individual schemes may be better located within Policy CS2

**Council
Response:**

The Council supports its policy approach as sound and legally compliant. The Council has incorporated necessary flexibility for market change whilst including sufficient flexibility for negotiation relating to development viability within Policy CS27 and in accordance with the outcomes of the Economic Viability Assessment (EB06). As a consequence it is considered that the suggest changes are not necessary or appropriate

Caring for Knowsley

Objection

AE - Attending Examination

401

**Summary of
Main Issues**

- Not positively prepared as it would reduce the total amount of development coming forward, especially on brownfield sites.
- Not properly justified by evidence and is not the most appropriate strategy.
- Not effective as it is not totally deliverable.
- Section 5 of CS22 should be deleted as it is inconsistent with Sections 3 and 4 and makes the achievement of local standards a mandatory requirement.
- It is considered that Section 10 of CS22 which states that further policy details will be set out in a SPD, is not the correct approach as such details would have a major impact on development viability and should be contained in a development plan policy.
- Section 1g of CS22 is unduly onerous and potentially contrary to competition law. It should therefore be deleted.

**Summary of
Suggested
Changes**

- Delete Section 1 (g) of Policy CS22.
- Delete Section 5 of Policy CS22.
- Detailed policy requirements should be included in Policy CS22 rather than deferred to an SPD.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant, as supported by the Economic Viability Assessment (EB06) with sufficient flexibility of requirements within the policy to account for development viability in addition to negotiations permitted separately by Policy CS27 where contributions are required. In addition, it is considered that the deferral of further details on requirements to a future SPD is appropriate, as this approach is intended to provide appropriate clarification and understanding on a complex issue as opposed to introducing additional development costs or requirements outside of the Local Plan policy. The suggested changes are therefore considered to be neither necessary or appropriate.

Caring for Knowsley

Objection

WR - Written Representation

401

Summary of Main Issues - Policy CS22 needs to include reference to the viability of delivery of sustainable and low carbon development within various paragraphs of the text (Parts (5) and (8)), in addition to it being mentioned in Part (8), flexibility is required so that delivery of this policy does not make schemes unviable

Summary of Suggested Changes - Amend Policy CS22 Part (5) - add the words "and/or viable" after the words "not feasible"
- Amend Policy CS22 Part (8) - add the words "and/or viable" after the word feasibility

Council Response: The Council supports its policy approach as sound and legally compliant. The Council has also included sufficient flexibility for negotiation relating to development viability within Policy CS27 to ensure that the suggested changes are neither reasonable nor appropriate.

Caring for Knowsley

Objection

AE - Attending Examination

401

Summary of Main Issues - Question whether economic viability implications of policy requirements have been considered
- Contributions to the Community Energy Fund, alongside CIL and other contributions, at a time of ongoing recession, could lead to development proposals stalling or not coming forward at all which conflicts with the objectives of the NPPF particularly Para 205
- Policy CS22 lacks justification and is at odds with national planning policy

Summary of Suggested Changes - Incorporate sufficient flexibility in line with viability considerations

Council Response: The Council supports its policy approach as sound and legally compliant. The Council has included sufficient flexibility for negotiation relating to development viability within Policy CS27. As a consequence it is considered that the suggest change is not necessary or appropriate.

Caring for Knowsley

Objection

AE - Attending Examination

401

**Summary of
Main Issues**

- Object to Policy CS22 Parts (3) and (4) as the inclusion of low carbon requirements such as the Code for Sustainable Homes and BREEAM are outside of planning control meaning the overall approach and policy is flawed, as it is not based on a robust and justifiable evidence base
- Object to the proposed requirements to deliver decentralised renewable and low carbon energy systems, Policy CS22 Part (7), which does not robustly set out the viability of renewable energy provision in developments or clearly define the scale the requirements should be implemented
- Policy CS22 is not based on national policy as it fails to ensure viability and deliverability in accordance with the NPPF (173-174)

**Summary of
Suggested
Changes**

- Delete the reference in Policy CS22 to Code for Sustainable Homes and BREEAM
- Set out the requirements for what is considered to be major development in the context of decentralised energy and low carbon energy systems

**Council
Response:**

The Council supports its policy approach as sound and legally compliant. The Council has incorporated necessary flexibility for market change whilst including sufficient flexibility for negotiation relating to development viability within Policy CS27 and in accordance with the outcomes of the Economic Viability Assessment (EB06). As a consequence it is considered that the suggest changes are not necessary or appropriate.

112/1112.5/ 9.20 CS24 / S 4

Mrs Deborah King

Plan
Order.ID

Caring for Knowsley

Objection

AE - Attending Examination

421

**Summary of
Main Issues**

- Given the new development may cause unacceptable flooding it is advisable to locate in areas of low probability of flooding - KGBS17 (Cronton Colliery and Land South of the M62) if developed is likely to cause extensive flooding along the brook to the south of the site, which affects my house and workplace (riding centre) - a copy of parcel analysis (K057 / K058) shows extent of flooding at Riding School and Dacres Bridge Lane.

**Summary of
Suggested
Changes**

- New development should not take place on areas at high risk of flooding.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), as supported by evidence in the Green Belt Study (EB08) and Strategic Flood Risk Assessments (EB14 & EB15). In this regard, it should be noted that developable areas within the broad locations for Green Belt release are intended to account for the need to avoid increasing flood risk within the site and to surrounding areas, with appropriate mitigation provided as part of schemes where necessary.

113/1113.7/ 9.20 CS24

Mr David Hopkin

United Utilities Plc

Plan
Order.ID

Caring for Knowsley

Support with Amends

WR - Written Representation

421

**Summary of
Main Issues**

- Designs that will be adaptable to climate change, and adopt principles of sustainable construction including Sustainable Drainage Systems (SuDS) are encouraged.

**Summary of
Suggested
Changes**

- Discharge of surface water, directly or indirectly, to the public sewerage system should be a last resort if it can be demonstrated that no other solutions are suitable.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant. The suggested change is not considered necessary given the policy approach conforms to this requirement.

**Summary of
Main Issues**

- The council is encouraged to adopt a pragmatic approach to areas at risk from flooding, accounting for availability of onsite tools
- May not be appropriate for developers to maintain flood risk mitigation measures in the long term e.g. where SUDS are adopted by the water authority

**Summary of
Suggested
Changes**

- Further clarity is required on Point 4. where it is stated that specific flood mitigation measures should be funded by development, including long term maintenance

**Council
Response:**

The Council supports its policy approach as sound and legally compliant. Sufficient flexibility relating to flood risk mitigation is included as part of Policy CS24 Point 4. with suitable assessment of policy asks provided by the Economic Viability Assessment (EB06). As a consequence the suggested change is not considered to be necessary or appropriate.

Caring for Knowsley

Objection

AE - Attending Examination

422

**Summary of
Main Issues**

- Broadly support the wording of policy CS24
- Object to the insufficient flexibility to bring forward development in flood risk areas in Policy CS24 Part (2) and Policy CS24 Part (4) bullet 4 which implies that flood risk mitigation should be funded by the developer, including long term maintenance
- The policy fails to acknowledge that flood risk mitigation measures may not require long term maintenance and may ultimately been adopted by water authorities, including SuDS
- It is not justified as development should be permitted in flood risk areas where the proposed flood risk mitigation measures are demonstrated to be appropriate to make the development acceptable. The long term maintenance of flood mitigation measures by developers is not appropriate in all instances

**Summary of
Suggested
Changes**

- Re-word Policy CS24 Part (2) to "New development in areas of medium or high flood risk will be permitted where proposed flood risk mitigation measures are demonstrated to be appropriate to manage flood risk associated with or caused by development"
- Re-word Policy CS24 Part (4) bullet 4 to: "Be funded by the developer, including long-term maintenance where this is appropriate"

**Council
Response:**

The Council supports its policy approach as sound and legally compliant. As a consequence, the suggested changes are not considered necessary or appropriate.

Caring for Knowsley

Support with Amends

WR - Written Representation

422

**Summary of
Main Issues**

- Flood risk management policies in Knowsley can impact on flood risk in neighbouring authorities, including Sefton.
- Flood risk policies in Knowsley should make sure that development does not increase river flood risk anywhere outside the development site.
- Development close to the Sefton-Knowsley boundary could have an impact on surface water flood risk across the boundary, and so surface water run-off should be managed in a similar way in both Boroughs. This is in line with the NPPF which says that development should not increase flood risk elsewhere.

**Summary of
Suggested
Changes**

- Policy CS24 should be clarified to state that any increase in flood risk, from any source, would be unacceptable. This will help prevent there being an increased risk of river and surface-water flooding in Sefton.

**Council
Response:**

Noted. The Council is satisfied that its approach is sound and legally compliant.

Caring for Knowsley

Objection

WR - Written Representation

422

**Summary of
Main Issues**

- Water will find its own level and create havoc.
- Cronton Colliery is below sea level and an area of severe subsidence, with an associated risk of flooding.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council supports its policy approach as sound and legally compliant with appropriate explanation and justification within the Technical Report: Green Belt (TR03), as supported by evidence in the Green Belt Study (EB08) and the Strategic Flood Risk Assessment (EB14 & EB15).

**Summary of
Main Issues**

- The importance of all development proposals considering the means for dealing with surface water prior to the grant of any planning permission is strongly emphasised, reflecting the requirements of National Government policy.
- It is a key component of responding to the challenge of sewer flooding and the unnecessary and unsustainable treatment of surface water in waste water treatment works. The public sewerage system is a last resort for dealing with surface water.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

The Council notes the comments in this representation which do not present any soundness or legal compliance issues for the Local Plan.

**Summary of
Main Issues**

- As you will be aware the Knowsley area contains coal resources which are capable of extraction by surface mining operations.
- The Coal Authority are keen to ensure that coal resources are not unduly sterilised by new development, and would be seeking prior extraction where this otherwise would be the case.
- The Core Strategy seeks to postpone the determination of Mineral Safeguarding Areas to the latter DPD on Site Allocations, whilst this approach is acceptable it is important that the Core Strategy sets out an overall strategic approach which accords with national planning policy.
- The NPPF test for mineral safeguarding is 'known' locations of mineral resources, it does not set out any test of economic importance, and then goes on to define what minerals are of national and local importance which should be safeguarded, which includes coal resources.

**Summary of
Suggested
Changes**

- Amend Policy CS25 (2) to remove reference to 'viable mineral deposits considered to be of current economic importance' and replace it with 'mineral resources of national and local importance'.
- Amend Policy CS25 (2) to replace 'Proposals' Map with 'Policies' Map

**Council
Response:**

The Council supports its policy approach as sound and legally compliant, and whilst the comments are noted, the reference to economic importance is intended to reflect the feasibility of extraction of minerals when designating Minerals Safeguarding Areas. In addition it should be noted the Para. 1.12 provides clarification for the avoidance of doubt that the 'Proposals Map' fulfils the role of the 'Local Plan Policies Map' for the purposes of regulatory compliance. On this basis, the suggested changes are not considered to be necessary.

82/1082.1/ CS25 / LC

Mrs Philippa Lane

Greater Manchester Minerals and Waste Planning Unit

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Caring for Knowsley

Support with Amends

WR - Written Representation

433

**Summary of
Main Issues**

No comments on soundness of Policy CS25.

Section 3a of Policy CS25 could be clarified by informing the development of the type of information expected to be submitted when demonstrating a proportion of construction aggregate would be from recycled / secondary resources.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Noted.

13/1013.5/ CS26

Mr Jermaine Daniels

Merseyside Environmental Advisory Service

Plan
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Caring for Knowsley

Support

WR - Written Representation

441

**Summary of
Main Issues**

Policy CS26 is in general conformity with the Joint Merseyside and Halton Waste Local Plan.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Supportive comments welcomed.

67/1067.3/ CS27

Mr Marcus Hudson

Lancashire County Council

Plan
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Delivering Infrastructure

Support

WR - Written Representation

456

Summary of Main Issues Satisfaction that the levels of development proposed will not have a major impact on the neighbouring authority of West Lancashire with regard to education and transport.

Summary of Suggested Changes n/a

Council Response: Noted and welcomed.

108/1108.10/ CS27 / S 1 2 3 4 / LC

Junction Property Ltd

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Delivering Infrastructure

Objection

AE - Attending Examination

456

Summary of Main Issues

- Not positively prepared as it would reduce the total amount of development coming forward, especially on brownfield sites.
- Not properly justified and is not the most appropriate strategy.
- Not effective and not totally deliverable.
- Section 3 of CS27 should be deleted as the Infrastructure Delivery Plan is not a properly tested DPD and there should be no requirement to comply with it. Requirements on new development are already covered in Sections 1 and 2.
- There is not considered to be a need for all development to contribute toward strategic infrastructure. Such a requirement should be set out in the Community Infrastructure Levy and not additional to normal Section 106 payments as implied by the policy.

Summary of Suggested Changes

- Delete Section 3 of Policy CS27.
- Delete Section 4 (c) of Policy CS27.

Council Response: The Council considers that its policy approach is sound and legally compliant, and consequently the suggested changes are not necessary or appropriate.

Delivering Infrastructure

Objection

WR - Written Representation

456

**Summary of
Main Issues**

- The requirement for developers to pay the Council for the independent scrutiny of the economic viability evidence submitted is not justified and is the Council's responsibility and should be at the Council's cost. The planning application fee submitted is all that the developer should have to pay for the determination of a planning application (other than Section 106 costs).

**Summary of
Suggested
Changes**

- Remove reference in Policy CS27 Part (6) to development being required to provide funds for the independent scrutiny of any viability evidence submitted by the Council.

**Council
Response:**

The Council supports its policy approach as sound and legally compliant.

**Summary of
Main Issues**

- No reference to how contributions will be made proportionate to the scale and type of development being delivered, which is fundamental to CIL and other forms of developer contributions
- Unclear whether contributions made via developments within a certain area of the Borough will be targeted to the infrastructure projects within that area
- Need greater flexibility applied to approach to developer contributions to prevent stalling of development

**Summary of
Suggested
Changes**

- Reference should be made to how the contributions will be made proportional to the scale and type of development being delivered
- Clarification required as to whether contributions will be directed towards funding of priority infrastructure projects, and how CIL monies / contributions would be pooled and utilised
- Reference should be draw to NPPF paragraph 204 and 205 regarding flexibility to prevent the stalling of development

**Council
Response:**

The Council supports its policy approach as sound and legally compliant. The Council has included sufficient flexibility for negotiation relating to development viability. As a consequence, the Council does not consider that the suggested changes are necessary or appropriate, particularly as the detail relating to planning obligations is to be included in a Planning Obligations SPD and CIL Charging Schedule as appropriate.

**Summary of
Main Issues**

- Water and wastewater services are vital for the future health and wellbeing of local communities and the protection of the environment.
- When progressing the development plan and future policies, LPAs should consider the impact of new development and the availability of infrastructure with capacity.
- If infrastructure deficiencies exist, it is preferable to seek an alternative location. If this is not possible, consideration should be given to the timescale of improvements to infrastructure and delivery of the development to ensure these are co-ordinated.

**Summary of
Suggested
Changes**

- Consider the impact of new development and the availability of infrastructure with capacity.
- Consider timescale of improvements to infrastructure and delivery of the development to ensure these are co-ordinated.

**Council
Response:**

The Council notes the comments received in the representation and considers that this issue has already been subject to significant ongoing discussion with United Utilities as part of the preparation of the Infrastructure Delivery Plan and in meetings on an annual basis with resolution to the extent that there are considered to be no significant constraints to the delivery of development progressed through the Local Plan. Consequently the Council has requested confirmation of this position.

Delivering Infrastructure

Objection

AE - Attending Examination

456

**Summary of
Main Issues**

- Policy CS27 Part (1) (c) requires that new development will be required to replace existing inadequate infrastructure, however new development should not be required to address an existing deficiency

- Within Policy CS27 Part (4) (c) is not considered appropriate to set out in an SPD a charging mechanism for the setting out of a previously unidentified infrastructure payment as it will not allow proper and full consultation and examination required of a Development Plan Document

**Summary of
Suggested
Changes**

- the Core Strategy should set out clearly in the policy what if any infrastructure payments are sought

**Council
Response:**

The Council supports its policy approach as sound and legally compliant. This is noting that Policy CS27 (1) includes sufficient flexibility to ensure that the requirement to address an existing deficiency is where appropriate in the context of NPPF Para. 204, and an examination remains unnecessary for details that may be included in an SPD to aid infrastructure delivery and avoid creating unnecessary financial burdens on developers. In this regard, the Local Plan (and NPPF) clearly guides consideration of economic viability in creating any associated guidance. On this basis, the suggested change is not considered to be necessary or appropriate, noting that Policy CS27 is required to be sufficiently flexible to account for potential scenarios and contingencies in the event that Community Infrastructure Levy is or is not progressed.

Delivering Infrastructure

Objection

AE - Attending Examination

456

**Summary of
Main Issues**

- Broadly support that financial contributions will be required to mitigate the impact of development proposals on infrastructure and services
- Strongly object to the provisions of Policy CS27 Part (6) as there is insufficient evidence to justify the requirement for developers to pay the Council for the independent scrutiny of the economic viability evidence submitted
- Policy CS27 fails to ensure viability and deliverability in accordance with the NPPF (173 and S174)

**Summary of
Suggested
Changes**

- Add wording to 4 (c) to ensure it “will only be applied to developments where it will not affect their deliverability or viability”
- Remove reference to the need for developers to provide funds for the independent scrutiny of any viability evidence submitted to the Council

**Council
Response:**

The Council considers that its policy approach is sound and legally compliant, and consequently the suggested changes are not necessary or appropriate.

13/1013.6/ Appendix C APX

Mr Jermaine Daniels

Merseyside Environmental Advisory Service

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Appendices

Support

WR - Written Representation

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**Summary of
Main Issues**

Support for the retention of UDP Policy ENV5 which will ensure that issues relating to contaminated land will continue to be dealt with in an appropriate and effective manner.

**Summary of
Suggested
Changes**

n/a

**Council
Response:**

Supportive comments welcomed.

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