



Knowsley Council

Knowsley Local Plan: Core Strategy

Accounting for Preferred Options Consultation

November 2012

Introduction

- 1.1 This document sets out the main issues raised by consultees, as part of the public consultation on the Knowsley Core Strategy Preferred Options Report, undertaken from June 2011. These main issues raised have been collated as part of statutory consultation process, culminating in the production of a formal Report of Consultation for the Preferred Options Report. This Report accounts for the range of responses that were submitted by via leaflet return, letter, email and the consultation portal.
- 1.2 The Report of Consultation is set out in a number of sections, relating to a) responses to the Preferred Options summary leaflet, b) responses to the full Preferred Options Report and c) responses to the supporting documents published alongside the Green Belt study. This document focuses only on responses to the policy content of the Preferred Options Report itself; responses to supporting documents have been accounted for in the revision and refinement of these, as they have progressed towards final versions.
- 1.3 Each of the main issues raised in relation to each of the Core Strategy policies (i.e. CS1, CS2, etc) have been listed out in table form. These are referenced with paragraph numbers from the Report of Consultation, to ease read-across between the two documents. For each issue, the Council has responded as to whether the issue raised has resulted in a change to the Core Strategy (i.e. with a “yes” or a “no”), as policies progress from Preferred Options to Proposed Submission version. This position is supplemented with explanatory text, which sets out why a change has or has not been made, with reference to relevant justification. 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 Council has sought to respond to these issues explaining why accounting for the response is not relevant to the process.
- 1.4 A further table has been produced listing out all of the responses to the Preferred Options Report summary leaflet. These have been 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.
- 1.5 The Council has used the findings of this exercise to amend and refine the Core Strategy policies, as the Proposed Submission Version is drafted. It is therefore possible to use this document to identify how the Council has accounted for the findings of the Preferred Options consultation stage. This exercise will be followed at the final stage of consultation, where the Council will collate all of the responses received to the Proposed Submission Version, forward these as part of the Examination in Public of the Core Strategy, and consider whether any of these raise significant soundness and/or legal requirements issues for the Core Strategy.

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Vision and Strategic Objectives

List of respondents

- Mr Jermaine Daniels (ID: 370866) , Merseyside Environmental Advisory Service (MEAS)
- Mr Paul Daly (ID: 389928) , Sport England - NW Region
- (ID: 382179) , NV Assets LLP
- Mr Alan Hubbard (ID: 419883) , The National Trust
- Mr Andrew Thorley (ID: 485368) , Taylor Wimpey UK Limited
- (ID: 588440) , Barratt Homes
- Mr Robin Buckley (ID: 389989) , Redrow Homes
- Victoria Murray (ID: 457367) , Redrow
- (ID: 588436) , Spencer Industrial Estates Limited
- Mrs Judith Nelson (ID: 370871) , English Heritage - NW
- Janet Bagueley (ID: 371683) , Natural England
- Christine Duffin (ID: 588372) , Homes and Communities Agency
- Mr Simon Clarke (ID: 588426) , Highways Agency
- Ms Dawn Hewitt (ID: 370989) , Environment Agency

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
Spatial Vision – support	B3.1 a)	The Spatial Vision is supported along with Strategic Objectives 5 and 8.	No	Noted and welcomed.
Spatial Vision – support	B3.1 b)	The Spatial Vision is generally supported and broadly sets out the correct priorities. Particular support is given to the aim of providing a wide choice of housing to meet local needs and creating a housing offer and safe, vibrant and cohesive communities which will attract residents	No	Noted and welcomed.
Spatial Vision – support	B3.1 c)	The commitment to provide a wide choice of housing is welcomed	No	Noted and welcomed.
Spatial Vision – support	B3.1 d)	The spirit of the Vision is supported, alongside the explicit recognition of the links between open space, sports and leisure facilities with active and healthier lifestyles. It should be added that active	No	Noted and welcomed.

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		lifestyles, including access to sport and recreation, can play a central role in relation to quality of life and sustainability		
Spatial Vision – support	B3.1 e)	Support is given for the references made to sustainable transport, open space, recreation opportunities, landscape character, biodiversity / geodiversity, and multi-functional green infrastructure	No	Noted and welcomed.
Spatial Vision – support	B3.1 f)	The statement that <i>‘New housing will be provided in sustainable locations, be well-designed, affordable and form attractive and identifiable neighbourhoods where residents choose to live’</i> is strongly supported.	No	Noted and welcomed.
Spatial Vision – support	B3.1 g)	The role of housing is of fundamental importance in meeting the wider aims and objectives of the Core Strategy, particularly those related to building a stronger and more diverse economy. The Borough’s housing offer and the provision of a range of housing, will be key to delivering and sustaining economic growth and particularly in attracting the skilled workers which Knowsley will critically need to deliver growth	No	Noted and welcomed.
Spatial Vision – support	B3.1 h)	Support is given for the statement that Knowsley will provide a wide choice of housing to meet local needs. It is considered that sites to the east of Halewood will provide a choice of housing types and tenures in a sustainable location and can provide an element of affordable housing in accordance with policy requirements	No	Noted and welcomed.

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Spatial Vision – support	B3.1 i)	The aim of ensuring that communities will be better connected to local employment opportunities, health care, education, shopping, leisure and recreation provision is supported	No	Noted and welcomed.
Spatial Vision – support	B3.1 j)	Support is given for the content of the Vision that relates to the District Centre of Halewood. In order for the redevelopment of the District Centre to come forward, additional housing will need to be provided within Halewood. This will allow such redevelopment proposals to be viable and provide a critical mass of residents to support the town centre (particular those living within aspirational family type homes).	No	Noted and welcomed.
Spatial Vision – objection	B3.2 a)	There is no long term vision on infrastructure when housing estates are created	No	The Council considers that its vision, objectives and policies account for the need for adequate supportive infrastructure in association with new development.
Spatial Vision – objection	B3.2 b)	The vision is flawed as building on the Green Belt gaps will merge Knowsley into other parts of Liverpool and St Helens	No	The vision does not specify that Green Belt development is an objective of the plan. Policy CS5 considers this issue in detail. It is contended that no part of the spatial strategy will result in the merging of Knowsley with Liverpool or St.Helens, as the integrity of strategic Green Belt gaps between settlements will continue to be protected.
Spatial Vision – objection	B3.2 c)	There is no specific reference to environmental quality or any waste-related/resource efficiency	Yes	The Council notes that there is specific reference to environmental quality

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		type issues within the vision statement. The Council should clarify this matter.		<p>within the vision statement, however it is accepted that there are benefits to additional clarification in terms of Green Infrastructure and environmental resources. Amendments in this regard have been made accordingly.</p> <p>In contrast, it is considered that reference to waste / resource efficiency would be too prescriptive as it would fall within the wider remit of sustainability which is a core theme.</p>
Spatial Vision – additions and changes	B3.3 a)	Support would be given to an additional reference to the provision of open space within new housing development and climate change	Yes	<p>The Council agrees that the inclusion of a reference to climate change would enhance the vision and amendments have therefore been made accordingly.</p> <p>In contrast, specific reference to the requirement for the provision of public open space as part of new development is unnecessary as that is a matter for Core Strategy policies to determine. In any case the detail in this regard would fall within the broader strategic statement regarding enhancement of Knowsley’s open spaces.</p>

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Spatial Vision – additions and changes	B3.3 b)	At present the Vision only refers to heritage and biodiversity in relation to rural areas. This needs to be amended to recognise the importance of heritage and biodiversity across Knowsley, including in urban areas.	Yes	The Council agrees that the reference to areas of environmental importance can be improved through the subdivision from references to rural areas, given the vision was not intending to imply exclusion of urban areas.
Spatial Vision – additions and changes	B3.3 c)	The Vision refers to rural landscapes as do the Area Priorities for the Halewood area, therefore the inclusion of a landscape policy which summarises the important aspects of the character of Knowsley's landscapes and how these will be protected and enhanced, is requested	No	The Council considers that valuable landscapes are adequately considered as part of Core Strategy policies relating to design, green infrastructure and protection of designated areas (e.g. Policies CS8 and CS19-21). A specific landscape character policy is not therefore required as part of this document. The Council may consider inclusion of additional policy guidance in relation to this matter as part of other planning policy documents.
Spatial Vision – additions and changes	B3.3 d)	The Vision should acknowledge the importance of enhancing the range and quality of supporting functions within Knowsley Business Park as a means to strengthen and diversify Knowsley's economy	No	The Council considers that the vision deals appropriately with strengthening and diversifying Knowsley's economy. There is no specific reference to any employment areas within the spatial vision. The detailed development proposals for the Knowsley Business Park area are given within Policy CS11.
Spatial Vision	B3.3 e)	The recognition is welcomed that Knowsley will	No	Noted and welcomed. The Council

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– additions and changes		seek to provide a wide choice of housing and that it will be provided in sustainable locations. However, the type and location of new housing should reflect market demand, as well as identified needs. There is a need to provide a broader range of housing, including larger family housing on attractive sites in good market areas e.g. in Prescot.		agrees that housing provision should account for housing needs as well as demands. As the Council is not a house builder itself, it considers that the market-led element will be led primarily by developers. The Council has also accounted for the demands of the market through its approach to underpinning policies with economic viability evidence. The Council’s policy approach to delivery of new housing is set out within Policy CS3 and Policies CS15 to CS18.
Spatial Vision – additions and changes	B3.3 f)	In order that the vision supports the provision of a wide choice of housing to meet local needs, the Council will need to ensure that the type of major development which will provide this wide choice of housing is permitted in sustainable locations. Strategic allocations which have a strong relationship to the current urban area should be promoted in order to deliver significant short term and long term benefits that other projects cannot achieve	No	The Council recognises the need for delivery of major new development in order to meet housing needs over the plan period. The Council however does not consider that strategic allocations are necessary or appropriate to support the achievement of the spatial vision. The Council is seeking to promote a range of locations, both within and adjacent to the existing urban area, in order to meet development requirements. This is reflected throughout the Core Strategy.
Spatial Vision – additions	B3.3 g)	The vision should give greater regard to the economic, social and environmental benefits that	No	The Council considers that the vision makes clear the components of

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and changes		can accrue as a result of new housing development, including short term and long term job opportunities, Community Infrastructure Levy (CIL) payments and the New Homes Bonus Scheme.		successful suburban townships that the Council wishes to achieve. Further details regarding the benefits of new housing development are given within Policy CS3. The role of new housing development in delivering infrastructure improvements (e.g. through CIL) is adequately explored in Policy CS27.
Spatial Vision – additions and changes	B3.3 h)	In order to ensure the vision for transport is met, it is suggested that the Council allocate strategic sites in sustainable locations, which take full advantage of the existing employment areas and community infrastructure. For example, Halewood benefits from links to employment sites, community facilities, recreation provision and transport links.	No	The Council does not consider that strategic allocations are necessary to ensure that the spatial vision and wider objectives of the Core Strategy are achieved. Site allocations will be made within the Local Plan: Site Allocations and Development Policies. However the Council recognises the value of promoting new development in locations which benefit from high quality existing infrastructure and other facilities; this is reflected in its spatial approach to new development as set out in Policy CS1 and Policy CS3.
Spatial Vision – additions and changes	B3.3 i)	The need to focus on delivering regeneration within areas such as Kirkby, North Huyton and Stockbridge Village is recognised. However, other areas of the Borough, and particularly those with stronger housing markets, such as South Huyton, offer more certainty over delivery, should not be	No	Noted. The Council is not seeking to marginalise areas with stronger housing markets; the majority of housing-related policies will apply across the Borough. The locations identified through the Core Strategy

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		marginalised as locations for housing growth		are either those which require regeneration and investment, or those which are currently within the Green Belt but have been identified as being required to meet longer term development needs.
Spatial Vision – additions and changes	B3.3 j)	The wording of the final part of the Vision could be improved by beginning with an overall sentence along the lines of 'the natural resources and environmental assets of Knowsley will be protected and enhanced, including...' - this would give the section more focus as at present it reads as a slightly disjointed list of environmental issues to be addressed with no overall focus linking the themes mentioned.	Yes	The Council agrees that the final sentence can be improved through additional clarification and changes having been made accordingly to provide a clearer focus. However this does not comprise the suggested changes which are too closely related to setting a policy agenda rather than providing a strategic vision.
Spatial Vision – additions and changes	B3.3 k)	The wording in the first sentence of the last paragraph should read 'The character and quality of landscapes will be protected and where possible enhanced...'	Yes	The Council agrees that the vision will benefit from references to protection of the character and quality of Knowsley's rural areas, amendments have been made accordingly. However a reference to enhancement of landscapes is not considered appropriate, given potential inconsistency with broader priorities of the strategy.
Spatial Vision – additions and changes	B3.3 l)	The Vision refers to "areas of biodiversity and geological importance", which is supported. The Vision should also acknowledge the role of creating networks and supporting biodiversity over the wider	No	The Council considers that this issue is too specific to be included in a strategic vision and is appropriately covered through the broader reference

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		landscape. The last sentence should be rephrased as: "The character of Knowsley's rural landscapes and the villages of Cronton, Tarbock and Knowsley Village will be maintained. The rural areas will provide distinct breaks between Knowsley's townships, and good public access for informal countryside recreation and opportunities for formal recreation. Knowsley's areas of biodiversity and geological importance heritage together with buildings, structures and areas of historic and cultural importance will be protected and enhanced, contributing to Knowsley's environmental quality and distinctiveness".		to biodiversity and geological value.
Strategic Objectives	B3.4 a)	Support is given for the Strategic Objectives which provide overall a strong sustainable framework for the Core Strategy	No	Noted and welcomed.
Strategic Objectives	B3.4 b)	The Strategic Objectives are broadly supported, and the explicit objective of improving access to leisure, sport and recreation facilities (amongst others) is welcomed. Quality of facilities, alongside access, including quantity of facilities, should be mentioned.	Yes	The Council agrees that there are benefits of including reference to quality of greenspaces within Quality of Place and amendments have been made accordingly. However specific reference to quality and quantity of facilities is considered too inflexible and prescriptive to include within a strategic objective.
Strategic Objectives	B3.4 c)	Given the challenge around housing land supply, it is felt that objectives should refer to protection of existing open space, sports and recreation facilities. It is recognised that PPG17 offers some	No	The Council considers that overarching strategic reference in the vision and objectives is sufficient to offer priority for greenspace provision.

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		protection, but local policies based on audits and assessments of needs are required in order to ensure that provision is appropriate, that deficiencies / surpluses are addressed, that spaces / facilities of high quality or value are protected, and that appropriate developer contributions can be sought.		A strategic objective is not the appropriate location to set out a detailed approach relating to open space, sports and recreation facilities which is more appropriately dealt with through Policy CS21.
Strategic Objective 1: Sustainable Economic and Employment Growth	B3.5 a)	Maximisation of regeneration opportunities is supported. The reuse of vacant property and emphasis on brownfield sites within the document is of great value	No	Noted and welcomed.
Strategic Objective 1: Sustainable Economic and Employment Growth	B3.5 b)	This objective is supportive of the Waste DPD indirectly.	No	Noted and welcomed.
Strategic Objective 2: Well-Balanced Housing Market	B3.6 a)	Strategic Objective 2 is welcomed, which seeks to promote a well balanced housing market throughout Knowsley, including larger executive housing, with a view to attracting new households to settle in Knowsley	No	Noted and welcomed.
Strategic Objective 2: Well-Balanced	B3.6 b)	The emphasis given to creating a balanced housing market, meeting needs and demands, increasing the delivery of housing at sustainable locations is welcomed	No	Noted and welcomed.

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Housing Market				
Strategic Objective 2: Well-Balanced Housing Market	B3.6 c)	Strong support is given to the supporting text for this objective which states that housing growth is needed in Knowsley to address the imbalances in the Borough's housing market	No	Noted and welcomed.
Strategic Objective 2: Well-Balanced Housing Market	B3.6 d)	Support is given for seeking to provide a sufficient quantity and mix of high quality sustainable housing in appropriate locations to meet needs and demand. The supporting text confirms that there is a shortage of a number of types of housing, including large executive homes. The release of Green Belt sites to the east of Halewood could provide a mix of housing types and tenure, including larger detached homes.	No	Noted and welcomed.
Strategic Objective 2: Well-Balanced Housing Market	B3.6 e)	Knowsley is in the top four in the UK for House repossessions. Therefore the Council have got this wrong in the past and in this strategy	No	Housing affordability is recognised as a major issue within Knowsley, in particular during the recent economic downturn which has seen the demand for social rented housing increase. The Core Strategy is planning to meet these outstanding needs. In addition, the Core Strategy is a long term plan, which needs to address housing provision up to 2028. Household projections and other housing growth scenarios indicate that substantial

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				numbers of housing are required in Knowsley.
Strategic Objective 3: Regenerate and Transform	B3.7 a)	It is questioned whether regeneration into vast housing estates is what residents want	No	The Council is in the position of needing to balance competing objectives while producing a sound plan. Evidence clearly indicates that the Council must plan for growth if it is to meet the needs of local people in terms of jobs and housing. This needs to be balanced with other objectives, like delivering environmental protection and infrastructure provision. These decisions may not always be popular with residents, but have been made in accordance with local evidence, and taking into account the views of local people and stakeholders in the Borough.
Strategic Objective 4: Distinct, Viable and Sustainable Town Centres	B3.8 a)	Support is given to policies to increase and/or improve upon retail and leisure opportunities within town centres, attracting new and improving existing facilities to create better choice and variety	No	Noted and welcomed.
Strategic Objective 4: Distinct, Viable and Sustainable	B3.8 b)	If the regeneration of Halewood District Centre is to take place, there needs to be a demand for these services which can only be released through new development within Halewood and in particular, new residential development	No	Noted. The Council supports the regeneration of Ravenscourt centre to benefit the existing local population. However, it is noted that new residential development would

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Town Centres				increase the local population and therefore could enhance the viability of additional retail facilities.
Strategic Objective 5: Quality of Place	B3.9 a)	The Council should consider the history of Whiston and should not build on what little is left of the Willis Estate	No	The Council has considered protection and management of heritage assets within the Core Strategy, most prominently in Policy CS20. Policy CS5 deals with the identification of land to the South of Whiston as potentially suitable for new development. This is supported by robust evidence, including the Green Belt study.
Strategic Objective 5: Quality of Place	B3.9 b)	Support is given for policies which ensure that the historic built and natural environments are not compromised by future development and that the local distinctiveness of the areas is enhanced.	No	Noted and welcomed.
Strategic Objective 6: Sustainable Transport	B3.10 a)	The inclusion of Strategic Objective 6 which targets the use of more sustainable modes of transport is supported	No	Noted and welcomed.
Strategic Objective 6: Sustainable Transport	B3.10 b)	Strong support is given for the encouragement of a modal shift away from car based transport and also for policies which promote sustainable transport. It is recommended that green travel plans are included within this section.	No	Noted and welcomed. The provision of Travel Plans and planning for sustainable travel modes are referenced in Policy CS 7.
Strategic Objective 6: Sustainable	B3.10 c)	The firm start within the Issues and Options Paper regarding an objective for transport has been built upon further by assertion of the value of the current	No	Noted and welcomed.

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Transport		Merseyside Local Transport Plan 3 (LTP3). Linkage between LTP3 and implementation plans of the Merseyside district authorities would help to facilitate more effective integration of land use and transport planning.		
Strategic Objective 7: Manage Environmental Resources	B3.11 a)	There should be a prudent focus on the environment and hence no building on Green Belt at Whiston.	No	The Council is seeking to balance a range of competing policy objectives in drafting the Core Strategy, which includes environmental protection. The Council considers that its approach adequately reflects this objective, while delivering other objectives such as planning for growth and delivering sustainable communities.
Strategic Objective 7: Manage Environmental Resources	B3.11 b)	The inclusion of this Strategic Objective is welcomed, which endorses the prudent use of natural resources and the tackling of climate change.	No	Noted and welcomed.
Strategic Objective 7: Manage Environmental Resources	B3.11 c)	It is recommended that this objective should also mention sustainable drainage systems and reducing water pollution which is a known issue in some areas of the borough.	Yes	The Council accepts that a reference to 'minimising pollution' would enhance the objective and appropriate amendments have been undertaken accordingly. Reference to specific types of pollution or delivery mechanisms for flood mitigation is too detailed to include within a strategic objective and are more appropriately addressed through supporting text and

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
				/ or policy.
Strategic Objective 7: Manage Environmental Resources	B3.11 d)	The supporting text for this objective should include water, as this needs to be used efficiently.	Yes	The Council agrees that it is appropriate to include reference to 'water' in the supporting text.
Strategic Objective 8: Green Infrastructure and Rural Areas	B3.12 a)	This objective is contrary to proposals to build on Green Belt land across Knowsley.	Yes	The Council does not agree that this objective is contrary to any of the policies set out within the Core Strategy, including Policy CS5. Nevertheless it is considered appropriate in the interest of clarity to set out Knowsley's requirement to review Green Belt boundaries and additional text has been provided accordingly.
Strategic Objective 8: Green Infrastructure and Rural Areas	B3.12 b)	This objective goes some way to covering issues relating to the natural environment, but this should be made more comprehensive by endorsing the conservation and enhancement of specific environmental assets including biodiversity, geodiversity and the landscape.	No	The Council considers that the detail within the supporting text is sufficient to provide clarity in this regard relative to the strategic objective, with specific action set out in Policies CS8, CS20 and CS21.
Strategic Objective 8: Green Infrastructure and Rural Areas	B3.12 c)	This section should include links to other relevant strategic objectives that benefit ecological connectivity and functionality between existing nature conservation areas within, and adjacent to the borough, ideally also mentioning and promoting the value and benefits of watercourses as wildlife corridors.	No	The Council considers that these issues are far too detailed to be included within a strategic objective given they fall within the remit of Green Infrastructure functions. Policy CS8 provides the focus for the more detailed approach to deliver the broad

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				strategic objective.
Strategic Objective 8: Green Infrastructure and Rural Areas	B3.12 d)	The objective should strengthen the focus on multifunctional benefits that developments can bring, including the potential for implementation of measures for offsetting the physical impact of developments on a case-by-case basis.	No	The Council considers that this issue is far too detailed to be included within a strategic objective given it falls within the remit of Green Infrastructure functionality. Policy CS8 provides the focus for the more detailed approach to deliver the broad strategic objective.
Strategic Objective 8: Green Infrastructure and Rural Areas	B3.12 e)	Reference should be made to the Liverpool City Region Ecological Framework and recognition made of the part Knowsley plays in delivering wider sub-regional strategic objectives.	Yes	The Council agrees that the supporting text would benefit from reference to the wider Liverpool City Region and changes have been made accordingly. However the strategic objective is not considered to be the appropriate location for reference to specific strategies and instead provides the focus for greater detail to be offered through policy or supporting text (as appropriate).
Strategic Objective 8: Green Infrastructure and Rural Areas	B3.12 f)	<p>Specific changes are recommended to strengthen the approach to green infrastructure, biodiversity and the character of rural settlements.</p> <ul style="list-style-type: none"> • Objective 8 Biodiversity: To enhance the biodiversity of Knowsley's urban and rural areas, by identifying and supporting ecological networks, sites of importance and areas for potential habitat restoration or creation • Objective 9 Rural Areas: Maintain the open character of Knowsley's rural areas and the 	No	The Council considers that it is not appropriate to subdivide the existing objective 8, as the existing structure provides sufficient strategic focus for the detailed issues to be addressed through Policy CS8. The suggestions in this context, are too prescriptive and detailed to include as an objective or are otherwise unnecessary (i.e., reference to supporting other strategic

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		<p>distinctive character of rural settlements including Cronton, Tarbock and Knowsley Village</p> <ul style="list-style-type: none"> • Objective 10 Green Infrastructure: To support and enhance Knowsley's Green Infrastructure and promote its role in supporting the other strategic objectives, particularly Regenerate and Transform, Quality of Place, Sustainable Transport, Manage Environmental Resources, Enhance Biodiversity and Rural Areas 		<p>objectives is implied as they all need to be addressed to meet the vision).</p>
Health and Wellbeing	B3.13 a)	<p>This objective is recognised in the document as being one of the highest priorities, but there is no specific strategic objective to achieve this. Instead, the objective is described as a cross cutting theme. It is felt that the priority of the aim would be better reflected by making it a specified strategic objective.</p>	Yes	<p>The Council agrees that Health and Wellbeing should be included as a 9th strategic objective and these changes have been made accordingly.</p>

Area Priorities

List of respondents

- Mr Jermaine Daniels (ID: 370866) , Merseyside Environmental Advisory Service (MEAS)
- Mrs Marie Reeve (ID: 559016)
- (ID: 588440) , Barratt Homes
- Christine Duffin (ID: 588372) , Homes and Communities Agency
- (ID: 588436) , Spencer Industrial Estates Limited
- Mr Carl Cashman (ID: 559304) , Knowsley Liberal Democrats - Kirkby Branch
- Mrs Judith Nelson (ID: 370871) , English Heritage - NW
- (ID: 556276) , Prescot Business Park Limited
- Mrs Vitti Osborne (ID: 370882) , Cronton Parish Council
- Ms J Bennett (ID: 560023)
- Mr Raymond Devers (ID: 588326)
- Mr Andrew Thorley (ID: 485368) , Taylor Wimpey UK Limited
- Victoria Murray (ID: 457367) , Redrow
- Nicholas Milner (ID: 588438) , Peel Holdings (Land and Property) Limited

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
General	B6.1 a)	It may be clearer if the numbers or headings were changed, or possibly combine both sets of “Key Issues and Opportunities” (i.e. Chapter 2 and Chapter 6) to improve the legibility of the document and avoid repetition.	Yes	Area priorities in Chapter 6 have been modified to provide a consistent link with spatial priorities and the localised issues to be addressed by policies and reduce repetition relative to Chapter 2.
General	B6.1 b)	The area priorities for both Huyton and Kirkby are broadly compatible with the Waste DPD with respect to employment uses on the relevant business parks and industrial estates.	No	Noted.
Huyton and	B6.2 a)	Not enough attention has been given to the	No	The area priorities for Huyton and

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Stockbridge Village		opportunities presented by both rail electrification, and building of a line to connect Manchester Victoria and Piccadilly stations, for Huyton. This will mean that the opportunities to travel to and from Huyton will be greatly expanded, and the integration with the bus network is an advantage. So, there could be a potential to attract people to Huyton, rather than Liverpool Lime Street, or Liverpool South Parkway, to commence their journeys, as well as the potential to attract more visitors to Huyton.		Stockbridge Village clearly support enhanced and sustainable transport connectivity, including to the wider transport network within the City Region which is intended to reflect the broad opportunities in the locality as opposed to a singular focus upon one project such as rail electrification. In this regard, Policy CS7 supports LTP3 priorities including rail electrification and associated enhancements to station infrastructure.
Huyton and Stockbridge Village	B6.2 b)	The need to deliver the regeneration of North Huyton and Stockbridge Village as part of the overall objective of delivering a more balanced housing market is not contested. However, in order to deliver a truly balanced market across the whole of Knowsley, support should be given to limited housing growth within stronger housing market areas such as South Huyton. Such areas are able to deliver higher quality, higher value housing which both the Borough and wider Liverpool City Region needs if it is to provide a balanced housing offer capable of supporting stated aspirations to achieve economic growth.	Yes	The area priorities have been modified to reflect the need for a diverse range of affordable and market housing.
Kirkby	B6.3 a)	The Key Issues and Opportunities for Kirkby in Chapter 2 addresses heritage assets and identifies the Conservation Area at Risk, however this is not	Yes	The area priorities for Kirkby have been amended to reflect a requirement to recognise the role and character of

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		followed through in the Area Priorities for Kirkby in Chapter 6.		the area's heritage value through the protection and enhancement of heritage assets. Specific reference to the Conservation Area in question has been removed to ensure flexibility to account for changes in circumstance to the status of all heritage assets in the local area. However the Conservation Area at Risk is alternatively mentioned in the supporting text of Policy CS20.
Kirkby	B6.3 b)	The availability of land for housing has seen the permanent loss of open space and playing fields during the last 20 years. This must put limitations on the land supply to meet regeneration needs and opportunities within the Northwood, Westvale and Southdene of Kirkby, as expressed.	No	The release of land for housing is an evidence based process relative to the Local Plan's policy approach. The area priorities reflect a focus upon the quality and accessibility of open spaces which is consistent with the Council's standards based approach towards quantity, quality and accessibility in Policy CS21 where there is a surplus of provision existing.
Kirkby	B6.3 c)	Support is given to the continuing emphasis on the need for comprehensive regeneration of Kirkby town centre and the residential area of Tower Hill, linking economic, residential, transport and health issues to create a more sustainable town centre.	No	Noted.
Kirkby	B6.3 d)	The term 'Industrial Park' refers to areas both north and south of the A580, thereby incorporating the Business Park. Both sites are considered as one	Yes	Minor amendments have been made to the text to clarify the focus for the different areas.

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		strategic location. This causes confusion when reading the wider document as it is unclear whether the Business Park is considered by the Council to form part of the Industrial Park in all circumstances or purely within specified options.		
Kirkby	B6.3 e)	The sentence "...as part of Knowsley's wider Green Infrastructure provision" should be added to the final bullet of the area priorities for Kirkby.	Yes	The wording relating to open spaces and Green Infrastructure has been altered to provide an approach which is consistent with other area priorities.
Prescot, Whiston, Cronton and Knowsley Village	B6.4 a)	There is no mention of provision of community or leisure facilities for Prescot. Scotchbarn Pool is closing, the leisure centre is being down-graded and hence there is no community centre of any description. The existing Methodist Centre is being used to capacity. There is a large church building which would be ideal for cultural or community use if the Council were prepared to do something with it; this should be part of the regeneration plans for Prescot.	Yes	Improving the mix of community and leisure facilities have been added to the area priorities.
Prescot, Whiston, Cronton and Knowsley Village	B6.4 b)	What is development grant of £45,000 for the Prescot Townscape Heritage Initiative being used for and are there any updates on the programme?	No	Enquiry was noted and referred to the relevant officers responsible for the Prescot THI project for a response.
Prescot, Whiston, Cronton and Knowsley	B6.4 c)	The historic environment is covered in the area priorities for Prescot, but there is no specific mention of the Conservation Area at Risk.	Yes	The area priorities for Prescot, Whiston, Cronton and Knowsley Village have been amended to reflect a requirement to recognise the role and

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Village				character of the area’s heritage value through the protection and enhancement of heritage assets. Specific reference to the Conservation Area in question has been removed to ensure flexibility to account for changes in circumstance to the status of all heritage assets in the local area. However the Conservation Area at Risk is alternatively mentioned in the supporting text of Policy CS20.
Prescot, Whiston, Cronton and Knowsley Village	B6.4 d)	The unique heritage and historic assets in Cronton are taken into account, which is supported.	No	Noted.
Prescot, Whiston, Cronton and Knowsley Village	B6.4 e)	An additional bullet point is suggested referring explicitly to a priority for the regeneration of the South Prescot Principal Regeneration Area. It is vital that this regeneration priority is identified and emphasised throughout the Core Strategy. This is equally significant and desirable as the regeneration of Prescot Town Centre. It is especially worrying that this element is not explicitly identified as an 'Area Priority' whilst a review of the Green Belt to meet longer term development needs is. The priority to review Green Belt boundaries will override the need to regenerate the wider South Prescot	No	The priorities for South Prescot were specifically referred to in the Preferred Options document and remain consistent with the detailed approach in Policy CS13 and identification of the location as a Principal Regeneration Area in Policy CS1.

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		Area and potentially undermine prospects for this area. The current and emerging national planning policy purpose of Green Belt to "assist in urban regeneration, by encouraging the recycling of derelict and other urban land" is highly significant. There is an argument that the review of Green Belt land for housing should only be countenanced to meet longer term development needs and should not precede the successful regeneration of the South Prescot Area.		
Halewood	B6.5 a)	The proposals in relation to Halewood appear to be a sacrifice of important Green Belt areas and ultimately will contribute to the slow urban sprawl towards the built up areas of Widnes and Runcorn.	No	The Council's approach relative to the Green Belt is detailed in Policy CS5, with accompanying explanation, justification and evidence within the Green Belt Technical Paper and Green Belt study.
Halewood	B6.5 b)	Strong support is given to the identification that an appropriate range of new residential development needs to be provided within Halewood in order to meet local needs. This will include both market and affordable housing, and would provide sustainable development within the Borough.	No	Noted.
Halewood	B6.5 c)	Broad support is given to the requirement for additional housing and investment, but there appears to be no account taken of land available for use in adjoining urban areas that can be utilised without relying on Green Belt i.e. land adjoining Jaguar Land Rover, United Utilities land bordering	No	The Council's approach relative to housing land supply and the Green Belt is detailed in Policies CS3 and CS5, with accompanying explanation, justification and evidence within the Planning for Housing Growth Technical

Area Priorities

Accounting for Preferred Options Responses

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		the Transpennine way or a significant surplus of land in Lee Park and Netherley		Paper, Green Belt Technical Paper, Green Belt study and Strategic Housing Land Availability Assessment.
Halewood	B6.5 d)	The Council is challenged to see how Halewood has declined over the last few years. A nonexistent shopping centre, local pubs closed or closing, working men's clubs derelict and empty, not even a takeaway. It cannot be right that in 2011 residents have to buy newspapers and groceries from the back of van. Residents want to hear when the work (on Raven Court) is going to start and what date is expected for the completion.	No	The Ravenscourt development has now commenced and residents are being updated regarding progress through the Council's community engagement.
Halewood	B6.5 e)	References made to the Airport Master Plan and the support given within the Core Strategy to both the expansion of Liverpool John Lennon Airport and the delivery of the Eastern Access Transport Corridor is welcomed.	No	Noted.
Halewood	B6.5 f)	In future drafts of the Core Strategy the proposed link road to the airport should be more accurately labelled as the 'Potential Eastern Access Transport Corridor'.	Yes	Amendment made as suggested in the interest of consistency.

Towards a Spatial Strategy	
List of respondents	
<ul style="list-style-type: none"> Janet Bagueley (ID: 371683) , Natural England Dave Smithson (ID: 588380) Mr Paul Daly (ID: 389928) , Sport England - NW Region Mr Jermaine Daniels (ID: 370866) , Merseyside Environmental Advisory Service (MEAS) Victoria Murray (ID: 457367) , Redrow 	<ul style="list-style-type: none"> Ms Dawn Hewitt (ID: 370989) , Environment Agency (ID: 382179) , NV Assets LLP Mr Robin Buckley (ID: 389989) , Redrow Homes Mr Andrew Thorley (ID: 485368) , Taylor Wimpey UK Limited Mr Andy Frost (ID: 370980) , Jones Lang Lasalle Mr Neil Scales (ID: 588428) , Merseytravel

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
Spatial Strategy influences	B4.1 a)	The proposals draw heavily on the demands laid down by the Regional Spatial Strategy and yet it is acknowledged that this document is in effect redundant with plans by the current government to revoke the strategy when the Localism Bill becomes primary legislation – this is problematic	No	Noted. The Council recognises that at the time of drafting the Preferred Options Report, the Localism Bill was still in draft form. At the time at which the Core Strategy is finalised, the Localism Act will be in place, and there will be greater certainty over the status of the Regional Spatial Strategy.
Spatial Strategy influences	B4.1 b)	National policy is currently in a state of flux. There are clear steers that matters such as whether to build on the Green Belt should be taken locally. Knowsley is therefore not to be bound by arbitrary targets set by central government. Equally, Knowsley shouldn't try to bind itself with such targets, when considering options for a spatial strategy	No	Through the drafting of the spatial strategy within the Core Strategy Preferred Options Report, the Council recognised that in the future, it would not be bound by targets for growth within the RSS. The Council therefore has developed an evidence base to inform its localised position on growth

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				targets. The Council considers it necessary to set this out within its Core Strategy, in order to plan positively for the future of the Borough, and to meet national policy requirements.
Options A, B and C	B4.2 a)	Support is given for the spatial strategy for Knowsley, including the focus on Option C	No	Noted and welcomed.
Options A, B and C	B4.2 b)	The spatial strategy is supported insofar as it accepts the need to identify areas within the Green Belt to meet, in part, the housing needs of Knowsley. Option C is supported as a very minimum measure to ensure the delivery of the housing target of 7650 homes over the plan period.	No	Noted and welcomed.
Options A, B and C	B4.2 c)	Support is given to the preferred approach which is a combination of Options B or C. This is good as this focuses development onto existing main settlements which are more accessible than the more outlying areas but with limited expansion into Green Belt to meet future needs	No	Noted and welcomed.
Options A, B and C	B4.2 d)	The Council's intention to incorporate Option C in its Preferred Spatial Strategy is welcomed, accepting that there is limited land available within the existing urban area to satisfy housing need through to the end of the plan period.	No	Noted and welcomed.
Options A, B and C	B4.2 e)	Support is given to Option C which was the only option the Council viewed as capable of meeting all of the development needs of the Borough through to the end of the plan period, i.e. 2027. It is agreed	No	Noted. The Council has considered, through its evidence base, the ability of Green Belt areas around the settlement of Halewood, to contribute

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		that aspects of this option should be mitigated by ensuring that the location of new development in the Green Belt is within the most appropriate and sustainable areas, which strong relationships with the existing urban area. For example, land adjacent to the existing settlement of Halewood would prove ideal to achieve these objectives.		to meeting growth requirements.
Options A, B and C	B4.2 f)	Option C was the only option capable of meeting all the development needs of the Borough over the plan period. There has been an over reliance on housing development within urban regeneration areas generally and within Knowsley in particular which has been a factor in the Council now considering the release of Green Belt land. The Council should promote sustainable urban extension within the Borough as this will not only readdress the housing imbalance but will also accord more closely with the Government's 'pro-growth' agenda. This requires Councils to take a proactive approach when considering development proposals and also to plan positively for growth.	No	Noted and welcomed. The Council still considers urban regeneration as a priority, and is promoting urban extensions as complementary measures subsequent to this, rather than alternatives, due to the lack of land availability.
Options A, B and C	B4.2 g)	A hybrid between Option B and Option C would provide more flexibility as to the future choice of sites for release for development, including those currently in the Green Belt	No	Noted and welcomed.
Options A, B and C	B4.2 h)	Support is given to the principle of combining elements of Option B 'Focussed Regeneration' and Option C 'Sustainable Urban Extensions'. However,	No	Noted. The Council recognises this through its efforts to maintain a realistic and flexible housing land supply, as

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		in order to meet housing needs, there is an urgent case for bringing forward sites which are genuinely deliverable at an early date and this cannot be achieved by relying solely on a strategy of focussed regeneration in the short term.		demonstrated through its Strategic Housing Land Availability Assessment. The Council considers that the focus in the short term should be on land within the urban area, identified in this evidence base, including regeneration areas. Only when this land supply runs short (i.e. less than five years), will the Council consider releasing Green Belt sites for development.
Options A, B and C	B4.2 i)	A clear preference for Option C has been expressed and this ought to be translated more explicitly as there is a risk that deliverable sites will be held back unnecessarily, with harmful social and economic consequences.	No	The Council is comfortable with its approach to release land for development over the plan period, which prioritises urban regeneration and complies with national policy. The Council does not consider that deliverable sites will be held back unnecessarily.
Options A, B and C	B4.2 j)	In general, the protection of Green Belt land is supported, as these areas can provide valuable open space on the urban fringe with associated benefits including recreation, human health and enjoyment and biodiversity conservation. However, some Green Belt land is of poor quality and therefore a stringent policy of avoiding any development on Green Belt land can increase pressure for development on land that may be more environmentally sensitive. Some Green Belt land	No	The Council recognises the value and purpose of Green Belt land within Knowsley, and is seeking to balance objectives to protect and enhance this asset, with objectives towards planning for growth. It is recognised that lower value Green Belt sites can be developed with lesser social and environmental impact than some greenspaces within the urban area.

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		can and should be enhanced to provide more greenspace benefits.		
Options A, B and C	B4.2 k)	Where Green Belt is to be reviewed there should be no net loss, and development on any areas removed from the Green Belt as part of a review should itself provide greenspace, so bringing about a net gain in greenspace.	No	It is not possible for the Council to guarantee that there will be no net loss in Green Belt or greenspace during the plan period. This is due to the identified pressure on Green Belt land to accommodate new residential and employment development towards the end of the plan period. However, the Council is seeking to adopt a range of policies aimed towards safeguarding greenspaces in each of Knowsley's communities, and provide new greenspace to support new development. The Council is seeking to maintain standards of provision of greenspace, through its evidence base and the developer contributions process.
Options A, B and C	B4.2 l)	Further reference should be made to the Draft National Planning Policy Framework, including the presumption in favour of sustainable development and the need for Local Planning Authorities to provide five years worth of housing against their housing requirement and in addition, to include an additional allowance of at least 20% to ensure choice and competition in the market for land.	No	At the time of drafting the Preferred Options Report, the position on the NPPF was not clear. The Council has since had the opportunity to absorb the implications of the NPPF for the Core Strategy, and this is reflected in the Proposed Submission Version Core Strategy.

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		Therefore the housing need is far greater than that which has already been acknowledged by the Council.		
Options A, B and C	B4.2 m)	Any option that includes expansion into the Green Belt areas will have a negative effect on the environment and the surrounding areas. Knowsley is a green area which is why a number of people choose to live within Knowsley rather than the 'urban' environment of Liverpool.	No	Noted. The Council recognises the value of greenspaces and Green Belt within Knowsley, both from a social and environmental perspective. However, the Council must balance this with objectives to accommodate required growth, in order that the requisite number of new homes and jobs can be provided. The Council considers that necessary steps can be taken through the application of planning policy to prevent and/or mitigate any negative effects on the local environment. This is reflected in the Sustainability Appraisal and Habitats Regulations Assessment which accompany the Core Strategy.
Options A, B and C	B4.2 n)	The recently published DEFRA White Paper on the Natural Environment should be mentioned with regard to Option C as it promotes the use of carbon offsetting and local partnerships to secure sustainable development.	No	Noted. The Council will consider the content of this White Paper.
Options A, B and C	B4.2 o)	In addition to ensuring that the actual locations of new development in the Green Belt are the most appropriate, a further mitigation option would be to	No	The Council is not able to offer any financial incentives for the development of previously

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		provide a financial incentive for the redevelopment of 'previously developed' land.		development land, particularly since little of this is within the Council's ownership. However the Council is clearly prioritising the development of land within urban areas as part of its approach to regeneration, and has also identified locations within the Green Belt for future growth, which has previously been developed e.g. Cronton Colliery.
Evidence base studies and technical reports	B4.3 a)	It would be prudent to add the LCR Ecological Framework to the LDF evidence base.	No	Noted.
Evidence base studies and technical reports	B4.3 b)	That a review of the open space, sport and recreation assessment is in preparation is welcomed.	No	Noted and welcomed.

Policy CS1: Spatial Strategy for Knowsley

List of respondents

- Mr Jermaine Daniels (ID: 370866) , Merseyside Environmental Advisory Service (MEAS)
- Mr Andrew Thorley (ID: 485368) , Taylor Wimpey UK Limited (ID: 588440) , Barratt Homes
- Mr Tony Docherty (ID: 545201) , Weston House
- Mr Andrew Leyssens (ID: 370943) , United Utilities Property Services Ltd
- Jonathan Parnes (ID: 383054) , Amalcroft Properties
- Jonathan Parnes (ID: 588781) , Knowsley Development Trust
- (ID: 588785) , Junction Property Limited
- Mr Robin Buckley (ID: 389989) , Redrow Homes
- Victoria Murray (ID: 457367) , Redrow
- Mr Simon Clarke (ID: 588426) , Highways Agency
- (ID: 588436) , Spencer Industrial Estates Limited
- Mr Neil Scales (ID: 588428) , Merseytravel
- Mr Alasdair Cross (ID: 588381) , Halton Borough Council
- Tom Hatfield (ID: 588368) , Sefton Metropolitan Borough Council
- Mr Graham Moorcroft (ID: 588347)
- Mr John Green (ID: 370893) , Halewood Town Council
- Mr David Aspin (ID: 408207) , Knowsley Age UK / Age Concern
- Mrs Vitti Osborne (ID: 370882) , Cronton Parish Council
- (ID: 382179) , NV Assets LLP
- Rachael Bust (ID: 169659) , Coal Authority
- (ID: 556276) , Prescot Business Park Limited
- Nicholas Milner (ID: 588438) , Peel Holdings (Land and Property) Limited
- Mr T W Bretherton (ID: 587223) , Residents of Foxshaw Close, Windy Arbor Close and Simons Close
- Mr J M Carter (ID: 587216) , Rainhill Civic Society
- Mr P. R Bate (ID: 560016)

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Spatial Strategy – Preparation	B5.2 a)	The role of spatial strategies and the way that they are to be prepared are explained in both PPS1 and PPS12. The Council has set in place the basic evidence to apply the proper approach. It has	No	The Council has produced additional evidence to underpin its approach to the distribution of growth between township areas. This has been based

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		<p>identified parts of the urban area with their own centres as 'townships' and for each of these, in accordance with good practice in plan making, has set out 'spatial profiles'. However, there is no evident connection thereafter between what is noted as the characteristics of the townships, and the amount of development that is directed to each of the townships. A basic and vital stage is absent from the process being followed in making the plan and this casts considerable doubt over the soundness of the preferred strategy. It is evident that Green Belt has been a primary consideration in the distribution of development. The total amount of development needed has been distributed according to the capacity within the urban area, followed by the use of the capacity available in the edge of settlement locations selected on the basis of the least harm to a very narrow and simplistic interpretation of their importance to Green Belt purposes. The Council has therefore departed from the spatial planning process set out in current policy guidance and which is set to be reiterated with NPPF</p>		<p>on robust available evidence, including that relating to development needs and demands, past trends, land supply and compliance with the overall spatial vision for the development of the Borough. The Council believes its approach is the most appropriate in the circumstances.</p>
Spatial Strategy – Preparation	B5.2 b)	<p>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. The spatial strategy should establish the broad distribution of development first, and do so having regard to the location and role of the main</p>	No	<p>As above, the Council considers its approach to the distribution of new development to be the most appropriate in the circumstances.</p>

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		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, movement patterns and the level and equity of accessibility. How the level of development, primarily housing and employment accommodation, is achieved and from which sources of supply - whether within the 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 overall distribution.		
Spatial Strategy – Preparation	B5.2 c)	The Preferred Options consultation document appears to distribute the residential provision in a proportionate way, that is, Halewood represents 15% of the population of the District and the dwelling provision for Halewood proposed in the plan is 15% of the total District provision. This does not amount to a strategy as there is no conscious shift in the existing situation proposed to address what the evidence says about parts of the District at present, or to help bring about any particular role for Halewood in the future. A greater proportion of the plan's District housing provision should be directed to Halewood.	No	The Council does not believe that a greater proportion of new development than is outlined (i.e. 15% of new housing provision) should be directed to Halewood. As noted above, the Council considers its approach to the distribution of new development, including within the area of Halewood, to be the most appropriate given the circumstances.
Spatial	B5.2 d)	The Core Strategy plan period only runs to 2027, it is	Yes	The Council considers it appropriate to

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Strategy – Preparation		questioned whether this should be extended in light of the Core Strategy timescales and the requirement in PPS12 for the time horizon of the Core Strategy to be at least 15 years from the date of adoption		extend the timescale of the Core Strategy plan period to 2028, reflecting its planned adoption in 2013.
Spatial Strategy - General	B5.3 a)	The strategic direction set by the Core Strategy should be a balanced and sustainable development approach towards integrating land use and transport, regeneration and economic development, social inclusion, and help tackle climate change.	No	The Council agrees with this statement, and is seeking to achieve these objectives through the Core Strategy.
Spatial Strategy - General	B5.3 b)	That the housing stock needs to be re-balanced by providing a wide choice of new market sector and affordable housing with supportive services and facilities appropriate to needs is supported.	No	Noted.
Spatial Strategy - General	B5.3 c)	Support is given for the Spatial Strategy and particular its focus on delivering development within existing urban areas. The urban area is already well served by existing infrastructure and well connected to key areas of activity, including town centres and other areas of service and employment concentration. Focusing development within the urban area represents a sustainable approach to delivering growth and is wholly consistent with principles of PPS1.	No	Noted.
Spatial Strategy - General	B5.3 d)	It would have to be demonstrated that any potential development impacts do not adversely impact upon the strategic road network. It is realised that the latter consideration has to be fairly balanced with the needs of urban regeneration. However, potential	No	Noted. The Council agrees that adverse impacts on the strategic road network arising as a result of new development should be avoided. Continued support is given to the role

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		developers should be required to assess traffic impacts via transport assessments including travel plan consideration. This is necessary in the interest of maintaining an efficient and safe strategic highway network		of transport assessments and travel plans as part of new development.
Spatial Strategy - General	B5.3 e)	The Council's spatial priority should be to create more open spaces, not less.	No	Noted. The Council's recognition of the important role of open spaces, and the need for their maintenance and enhancement, is reflected in the Core Strategy.
Spatial Strategy - General	B5.3 f)	Knowsley is one of the most deprived Boroughs in the country, and the aspirations for growth and development set out in the Core Strategy can be seen in this context.	No	Noted.
Spatial Strategy - General	B5.3 g)	This policy approach is broadly compatible with the Waste DPD.	No	Noted and welcomed.
Spatial Strategy - General	B5.3 h)	Support is given for the identification of the importance of maintaining the character of Knowsley's rural landscapes and the villages of Cronton, Tarbock and Knowsley Village.	No	Noted.
Spatial Strategy - General	B5.3 i)	Support is given for the objective of maintaining the position of Huyton within the settlement hierarchy and therefore as a sustainable location for growth. Huyton is the largest town within the Borough, is the principal centre, contains a critical mass of existing service and employment and is well served by existing infrastructure.	No	Noted. The Council is seeking to maintain and enhance the role of all three centres in Knowsley, including Huyton alongside Kirkby and Prescot.

Theme of Issue (<i>subtitle from ROC</i>)	ROC Para Ref	Summary of Issues Raised (<i>bullets taken from ROC</i>)	Changes made (<i>yes/no</i>)	Additional Council comments (<i>rationale behind why policy was changed</i>)
Spatial Strategy – brownfield, greenfield and Green Belt Land (see also CS5)	B5.4 a)	The emphasis on development within urban areas and the efficient and sustainable use of land and infrastructure should be strengthened to ensure that priority is given to the efficient and effective use of previously developed land within urban areas, ahead of greenfield sites.	No	The overriding priority within the Core Strategy is to ensure that the successful development of previously developed land within the urban area is prioritised over the use of greenfield sites. This is reflected in a continued focus on urban regeneration through the designation of Principal Regeneration Areas.
Spatial Strategy – brownfield, greenfield and Green Belt Land (see also CS5)	B5.4 b)	Further encroachment on the Borough's Green Belt areas should be resisted wherever possible and new developments should use brownfield and former residential / industrial land.	No	The Council agrees that the encroachment of new development onto Green Belt land should be resisted, and this is reflected in the Council's approach to prioritising development opportunities within the urban area (including brownfield and vacant sites) in the first instance. However, the necessity to accommodate future growth and the limited land availability in the urban area mean that development within the Green Belt is a necessary component of the Council's long term strategy.
Spatial Strategy – brownfield, greenfield and Green	B5.4 c)	More detail should be provided on brownfield land reclamation and redevelopment, as there may be sites which would be considered to be highly appropriate for housing development, such as currently unidentified vacant or soon to be vacant	Yes	The Council agrees that greater emphasis could be placed on the required processes for the reclamation, remediation and redevelopment of previously

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
Belt Land (see also CS5)		brownfield sites within the urban area.		developed land. Policy CS1 has been changed slightly to reflect this, although the content of the range of other policies focussing on urban regeneration (i.e. Principal Regeneration Areas) should also be noted. Comprehensive assessments of the ability of sources of previously development land have been undertaken as part of the Core Strategy evidence base.
Spatial Strategy – brownfield, greenfield and Green Belt Land (see also CS5)	B5.4 d)	There is concern that the necessary processes for ground preparation should be effectively carried out and monitored where potentially dangerous processes or substances remain from previous industry.	Yes	As above, it is agreed that greater emphasis could be placed on the need to successfully remediate and reclaim previously developed land before it can be redeveloped. There are areas within Knowsley within which this would represent a particularly important consideration. CS1 has been slightly changed to emphasise this to a greater degree. It should also be noted that Knowsley’s existing UDP contains policies on environmental protection, and there is also a range of legislation and guidance regarding environmental protection from other sources.
Spatial Strategy –	B5.4 e)	Support is not given for identified greenfield land to be used for housing development, especially as it	No	The Council’s identification of sources of Greenfield land for new

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brownfield, greenfield and Green Belt Land (see also CS5)		contains a substantial part of the local flood plain.		development have accounted for the Council’s evidence base regarding areas likely to be at risk of flooding. This has resulted in the suggestion that only parts of some sites would be suitable for development, or that mitigation measures would be required in other areas. The Council does not believe that any of its suggested development locations would have a detrimental impact on the operation of local flood plains.
Spatial Strategy – brownfield, greenfield and Green Belt Land (see also CS5)	B5.4 f)	The emphasis should be on development within and adjacent to the existing urban area, in order to cater for the full range of housing need/demand and support the local economy. The case for an early Green Belt review is supported, recognising that Knowsley's urban area is constrained in terms of housing land availability.	No	Noted and welcomed. The Council considers that its timescales for Green Belt review and release are the most appropriate given the need to prioritise regeneration areas within the Borough.
Spatial Strategy – brownfield, greenfield and Green Belt Land (see also CS5)	B5.4 g)	It is essential that a rigorous and considered approach to the review of Green Belt boundaries is undertaken in order to ensure that the release of land from the Green Belt does not impede or restrain urban regeneration.	No	The Council considers that its approach to the development of Green Belt areas, including its trigger mechanisms and phasing, are the most appropriate given the circumstances.

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
Spatial Strategy – brownfield, greenfield and Green Belt Land (see also CS5)	B5.4 h)	Support is given for the spatial strategy, especially the commitment to a review of Green Belt boundaries. Agreement is given with the Council’s position that there is no alternative if identified development needs and demands are to be met.	No	Noted and welcomed.
Spatial Strategy – brownfield, greenfield and Green Belt Land (see also CS5)	B5.4 i)	Considerations for Green Belt land release should start with achieving a sustainable and deliverable pattern of economic development for Knowsley through the identification of sites which will enhance the competitive advantage of Knowsley and the Liverpool City Region and only then examine the impacts arising from the development of these sites on the purposes of including land in the Green Belt	No	It is agreed that enhancing the competitive advantage of Knowsley and the Liverpool City Region should be a strategic priority, and the Council believes that its approach is in compliance with this. The development locations within the Green Belt, alongside those in the urban area, represent a real opportunity for Knowsley to compete in terms of its housing, employment, retail and services offer.
Spatial Strategy – brownfield, greenfield and Green Belt Land (see also CS5)	B5.4 j)	The spatial strategy and the proposed review of Green Belt boundaries to meet longer term needs for housing and employment development is in accordance with the Government’s pro-growth agenda and also with the Council being unable to provide sufficient housing land to meet demand over the plan period.	No	Noted.

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Spatial Strategy – Identification of Principal Regeneration Areas / other areas	B5.5 a)	Support is given for the identification of the Tower Hill area as a priority regeneration area	No	Noted and welcomed.
Spatial Strategy – Identification of Principal Regeneration Areas / other areas	B5.5 b)	That Green Belts in Cronton will be safeguarded is welcomed	No	Noted.
Spatial Strategy – Identification of Principal Regeneration Areas / other areas	B5.5 c)	The Council should identify alternative sites for mixed use schemes that have the capability to compete with the existing Kings Business Park and also draw in new investment from the wider Liverpool and Manchester regions. Therefore the identification of both Knowsley Industrial and Business Parks as a Principal Regeneration Area where development and regeneration can be maximised, is supported.	No	Noted and welcomed.
Spatial Strategy – Identification of Principal Regeneration Areas / other	B5.5 d)	The Council’s intention to rebalance the existing housing stock by providing a wide choice of new market sector and affordable housing in the Borough is supported. The area to the east of Halewood could provide a mix of types and tenures of housing and include affordable housing. If this site was developed	No	Noted and welcomed.

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
areas		it would increase demand for, as well as viability of, improved services within Halewood District Centre		
Suggested additions / changes	B5.6 a)	The Core Strategy should include a statement that, as part of taking forward any urban extensions or other large-scale development / redevelopment proposals, it will be necessary for any sterilisation effects on the coal resource to be considered, as well as whether the prior extraction of the coal would be appropriate	Yes	The Council agrees that additional emphasis should be given to establishing the status of development locations in terms of their potential contribution to provision of coal resources. However, the Council is mindful that mining within Knowsley is unlikely to be commercially viable, and therefore would not want to unnecessarily avoid opportunities to meet development needs. Changes have been made to policy CS25.
Suggested additions / changes	B5.6 b)	The Core Strategy should include a statement that, as part of taking forward development proposals within these areas, it will be necessary for the mining position and ground conditions to be fully considered and addressed.	Yes	Noted. Changes have been made to CS25.
Suggested additions / changes	B5.6 c)	The sentence relating to the application of the Principal Regeneration Area policy in other areas, subject to funding, should be deleted as it creates uncertainty in a key strategic policy. If further areas justify designation as Principal Regeneration Areas, the Council should make a formal amendment to Policy CS1 in the future.	No	The Council believes it is appropriate to highlight that there could be further opportunities for regeneration arising within different areas of Knowsley within the plan period. This element of CS1 reflects this. However, the Council notes that the designation of additional (or replacement) Principal Regeneration Areas should be

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
				considered as part of any future review of the Core Strategy.
Suggested additions / changes	B5.6 d)	Support is given for the Council’s intention to review Green Belt boundaries to meet the longer term needs for housing and employment development in the Borough, but this element of Knowsley’s Spatial Development Strategy should be reworded to be much more positive in relation to the release of Green Belt sites.	No	Noted. The Council considers that its approach to Green Belt review and release is sufficiently positive given the need to prioritise urban regeneration over the plan period, reflecting the spatial vision and national planning policy.
Suggested additions / changes	B5.6 e)	The Knowsley Older People's Strategy - 'A Positive Age' details improvements to enhance life for older people in Knowsley; there is a real opportunity now to ensure that some of these ideas are incorporated in the Core Strategy as the Council develops plans for the Borough for the next few years	Yes	The Council has actively considered the content of the strategy as it develops the final version of the Core Strategy. The needs of older people are reflected in particular in policies CS19 (in relation to design of new buildings and communities) and CS22 (in relation to design-enhanced energy security).
Suggested additions / changes	B5.6 f)	High priority should be given to the economic development of the Borough. The following wording should be added: <ul style="list-style-type: none"> • "Enhance existing employment areas and provide a <u>wide</u> range of sites and premises for new employment development." 	Yes	Noted. The Council does recognise the need to provide a wide range of sites and premises, as well as a sufficient quantity overall of employment land. Policy CS1 has been changed slightly to reflect this, although “suitable” has been used rather than “wide”, in order to better reflect the Council’s preferred approach to the provision of employment land, to meet business

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Suggested additions / changes	B5.6 g)	<p>The policy as set out is too broad insofar as it states that opportunities for development in the Priority Regeneration Areas will be maximised without any limitation or proviso, such as the protection of important greenspaces. For this reason, reference to 'development' should be deleted so that it now states:</p> <ul style="list-style-type: none"> • "Opportunities for regeneration within the following Principal Regeneration Areas will be maximised." 	Yes	<p>needs.</p> <p>Noted. Wording to CS has been slightly amended to reflect the prioritisation of regeneration activities in these areas. However the deletion of the word "development" was not considered appropriate as it was felt that this concealed the levels of new development which are to be encouraged within these areas.</p>
Key Diagram	B5.7 a)	<p>The identification of the Principal Regeneration Area at South Prescott is welcomed. The identification of Location 5 as a location reserved as an urban extension is a major concern, as this will undoubtedly impact on the regeneration prospects of the South Prescott Principal Regeneration Area. This element should be reconsidered with priority being given to the use of Green Belt as a strategic tool to encourage urban regeneration. Whilst the need for some Green Belt land is recognised, it would offer a much less sustainable and environmentally sound option to South Prescott Regeneration Area.</p>	No	<p>It is noted that the more sustainable and environmentally sound development option would be the South Prescott Principal Regeneration Area, and hence this is highlighted as a development priority in advance of Green Belt release. The role of the Green Belt as a strategic tool to encourage regeneration is noted; the Council's approach to phasing Green Belt release in response to land shortages within the urban area reflects this.</p>
Key Diagram	B5.7 b)	<p>It is questioned why Whiston has got the largest proposed expansion into Green Belt land for the development of housing, and then after 2027, bigger commercial development, when the areas of the old</p>	No	<p>It is noted that the land to the South of Whiston represents a substantial area of Green Belt release for both housing and employment in the longer term.</p>

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		Pirelli and cables factory in Prescott have not been fully developed yet.		The Council recognises the development opportunities offered by the vacant land to the south of Prescott, and has prioritised its development through the designation of the South Prescott Principal Regeneration Area.
Key Diagram	B5.7 c)	There will be no Green Belt in Whiston/Cronton to link to as commercial sites may occupy these linked spaces. A path along a disused railway line does not support the rich ecosystem of plants and animals that currently live in the Halsnead Park area.	No	The strategic green link between Whiston and Cronton remains a priority. The Council believes that the opportunities for housing and commercial development in this area, associated with Green Belt release, would offer opportunities for enhancement of local biodiversity, through investments in planting and maintenance of open and greenspaces as part of new development. Any impacts on flora and fauna will be assessed through appropriate assessments as part of planning applications for new development.
Key Diagram	B5.7 d)	The Key Diagram would benefit from the inclusion of the Strategic Opportunities areas to fully support the Ecological Framework and show where there are current assets and opportunities	No	It is not considered appropriate to show such designations on the Key Diagram. However they are included as part of the Core Strategy evidence base, and could also be included elsewhere in the Core Strategy

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				document.
Key Diagram	B5.7 e)	There is concern that Location 7 may be described as the flood plain for the River Mersey. Flooding has occurred on previous occasions in spite of a drainage system being installed hence there is concern that the proposed developments would increase the risk by reducing the area of absorption of the water. Assurances would be given that the development of this area would be of low to medium density, adequate room sizes, no higher than two storeys, accompanied by adequate off-road parking adjacent to the properties and developed alongside recreation facilities within the estate.	No	Concerns about flood risk in this location are noted. Flood risk was one of the elements accounted for within the Green Belt study, and hence within the process of selection of locations within the Core Strategy. Development level issues such as flood risk mitigation, the density and design of new residential development will be considered at the planning application stage, using Core Strategy policies to inform decisions.
Key Diagram	B5.7 f)	Concern is stated about proposal 8 on the map, and to a lesser extent about proposal 9.	No	Noted.
Key Diagram	B5.7 g)	The map within the Local Development Framework shows no clear boundaries of the sections of Green Belt land which are under threat of development, i.e. roads, properties, etc.	No	It is noted that the Key Diagram does not show clear site boundaries for Green Belt locations. This is because the Core Strategy does not show site allocations, only “broad locations” with approximate capacities, with clear boundaries to be identified in a subsequent Development Plan Document.
Key Diagram	B5.7 h)	The Key Diagram should not show land surrounding Widnes as Green Belt unless and until an appropriate assessment had been undertaken and agreed with Halton Borough Council	No	The Knowsley Core Strategy relates to Knowsley only. The approach to showing land in Halton with a designation of Green Belt is in

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
				accordance with both the adopted development plan within Halton, as well as Knowsley Council's understanding of the content of the emerging Core Strategy for Halton.
Key Diagram	B5.7 i)	Support is given for the inclusion of diagrammatic reference to the possible Eastern Access Road for Liverpool John Lennon Airport	No	Noted and welcomed.
Key Diagram	B5.7 j)	Consideration should be given to the inclusion of the now jointly consented access road to the 3MG site (Widnes)	No	The importance of the jointly consented access road is noted by the Council. However, it is not considered appropriate to highlight the road's route on the Key Diagram, particularly as it has already been given consent.
Key Diagram	B5.7 k)	On the various maps included within the consultation document the Eastern Access Transport Corridor is incorrectly referred to as the 'Potential Airport Link Road' – this should be labelled accurately	Yes	Noted. References to the EATC will be made consistent throughout the Core Strategy.
Key Diagram	B5.7 l)	Support is given for the identification locations to the east of Halewood reserved for urban extensions within the plan. This area is deliverable within the early part of the plan period and that there are no constraints to its development.	No	Noted. The Council supports its existing approach to phasing of Green Belt release in accordance with a land supply based trigger mechanism, as well as the phasing of site release within this process.
Key Diagram	B5.7 l)	Support is given for the identification locations to the east of Halewood reserved for urban extensions within the plan. This area is deliverable within the early part of the plan period and that there are no	No	Noted. The Council supports its existing approach to phasing of Green Belt release in accordance with a land supply based trigger mechanism, as

		constraints to its development.		well as the phasing of site release within this process.
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<p>Policy CS2: Development Principles</p> <p>List of respondents</p> <ul style="list-style-type: none"> • Mr Jermaine Daniels (ID: 370866) , Merseyside Environmental Advisory Service (MEAS) • Mr Andrew Leyssens (ID: 370943) , United Utilities Property Services Ltd • Mr Graham Moorcroft (ID: 588347) • Mrs Judith Nelson (ID: 370871) , English Heritage - NW • Mr Alan Hubbard (ID: 419883) , The National Trust 	
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Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
General	B5.8 a)	Support is given for the strong approach to sustainable development within strategic policy CS2, which is taken forward in more detailed policies particularly CS19, CS22 and CS23	No	Noted and welcomed.
General	B5.8 b)	This is an umbrella policy which sets the framework for much of what follows in these areas and is supported	No	Noted and welcomed.
General	B5.8 c)	This is a high level policy with limited detail but providing welcome profile for climate change mitigation and adaptation and carbon emissions specifically, resource (including water) efficiency and flood risk and protection of water, land and soil quality.	No	Noted and welcomed
General	B5.8 d)	The Development Principles are supported, particularly those related to the environment, local character and quality of place	No	Noted and welcomed.
General	B5.8 e)	CS2 supports and is compatible with the Waste DPD and promotion of waste as an employment use, and is compatible with the vision, strategic objectives and sustainable waste transport policy within the emerging DPD.	No	Noted and welcomed.

Policy CS3: Housing Supply, Delivery and Distribution	
<p>List of respondents</p> <ul style="list-style-type: none"> • Mr Andrew Thorley (ID: 485368) , Taylor Wimpey UK Limited • (ID: 588440) , Barratt Homes • Mr Tony Docherty (ID: 545201) , Weston House • Mr Andrew Leyssens (ID: 370943) , United Utilities Property Services Ltd • Jonathan Parnes (ID: 383054) , Amalcroft Properties • Jonathan Parnes (ID: 588781) , Knowsley Development Trust • (ID: 588785) , Junction Property Limited • Mr Robin Buckley (ID: 389989) , Redrow Homes • Victoria Murray (ID: 457367) , Redrow • Mr Neil Scales (ID: 588428) , Merseytravel • (ID: 588564) , Remondis UK Limited 	<ul style="list-style-type: none"> • Dave Smithson (ID: 588380) • Christine Duffin (ID: 588372) , Homes and Communities Agency • Peter Davis (ID: 587093) • Mr David Aspin (ID: 408207) , Knowsley Age UK / Age Concern • Dr Allan Richardson (ID: 587169) • Mr Barry Nelson (ID: 587150) • Mr M Harker (ID: 370883) , The Stanley Estate and Stud Co • Mrs Sandra Mayers (ID: 370892) , Whiston Town Council • Mr Carl Cashman (ID: 559304) , Knowsley Liberal Democrats - Kirkby Branch • Mr Mike Eccles (ID: 370920) , Liverpool City Council

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
General	B5.10 a)	The emphasis given to creating a balanced housing market, meeting needs and demands, increasing the delivery of housing at sustainable locations is welcomed	No	Noted and welcomed.
General	B5.10 b)	Housing is just one element of many that go towards creating sustainable communities. All the various elements are of equal importance e.g. health, education, shops, community facilities, etc.	No	The Council’s approach to the creation of new residential communities within Knowsley already reflects the need to supply various types of infrastructure

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		Delivering houses and not communities will just create dormitory suburbs and towns and so lead to greater and longer distance commuting; this will then have significant implications for the transport infrastructure		to support their development. The Council is mindful of reducing the need to travel, and hence impacts on transport infrastructure, as part of this. However, it may be necessary that new communities are serviced by new transport infrastructure to enable them to access key strategic services and employment.
General	B5.10 c)	A minimum density target of between 30 and 40 dwellings per hectare is not supported. The Council should ensure that density on new development sites remains flexible and therefore should not impose a minimum target. Each site put forward for development should be assessed on its own merits to ensure the best range and mix of housing is provided	No	The Council's approach to including indicative housing densities within Policy CS3 is the best approach in the circumstances. The approach does maintain elements of flexibility and would not necessarily restrict higher or lower densities if these were appropriate to the location in question for new development.
General	B5.10 d)	There is a strong case for encouraging lower densities in Knowsley in order to help re-balance the housing market. A more flexible approach is required which would involve an assessment of each scheme on its merits, having regard to the character of the surrounding area, the constraints of the site and evidence of need / market demand	No	It is agreed that lower density housing (particularly larger houses and bungalows) is required within Knowsley to help re-balance the housing market. The Council's approach does allow for flexibility on a site-by-site basis, if sufficient justification for departure from the indicative densities is given.

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General	B5.10 e)	Support is given to the Council’s intention to rebalance the housing market to better meet with needs and demands of these communities. There is a need for aspirational and larger family homes.	No	Noted.
Housing needs and targets	B5.11 a)	The Knowsley Housing Needs Assessment 2009 showed little increase in the population over the next 20 years.	No	Noted. The Council recognises that available population projections show limited overall population growth in Knowsley in the long term. However, pressure for housing growth arises primarily from the changing population and household structure, with the overall trend towards smaller households with less people. This is as a result of issues such as an ageing population, family breakdown and more single person households. In addition, there is a requirement to cater for outstanding housing needs, which have accrued over recent years. Further information is available in the Planning for Housing Growth Technical report.
Housing needs and targets	B5.11 b)	Recent news items have shown Knowsley in the top ten for house repossessions, so why do we need more housing if we can't afford the ones already built?	No	Housing affordability is recognised as a major issue within Knowsley, in particular during the recent economic downturn which has seen the demand for social rented housing increase. The Core Strategy is planning to meet

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				these outstanding needs. In addition, the Core Strategy is a long term plan, which needs to address housing provision up to 2028. Household projections and other housing growth scenarios indicate that substantial numbers of housing are required in Knowsley.
Housing needs and targets	B5.11 c)	There are still many houses in Prescot on the old BICC site which lie unsold. This proposal therefore is short sighted and only meets the requirements of developers and not the community	No	As explained above, the Council is seeking to implement a long term strategy for housing provision. It is recognised that there are various existing housing sites within which houses remain unsold, as well as unimplemented consents for new housing developments. The Council has taken all of these sources of housing supply into account in establishing its overall position on planning for housing growth.
Housing needs and targets	B5.11 d)	Knowsley has developed hundreds of houses around the borough in recent years and a number are still unoccupied particularly in Prescot	No	Noted. Housing growth within Knowsley has been fairly limited in recent years, reflecting economic issues and scaled back housing demand during the recession. However, as explained above, existing vacancy has been accounted for in calculating the levels of housing

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				growth required in Knowsley, and the Council remains content with its position on this issue.
Housing needs and targets	B5.11 e)	Objection is made to the housing target on the basis that it does not make any allowance for the shortfall in net housing completions since 2003. As the Core Strategy is still required to be in general conformity with the Regional Spatial Strategy (RSS), due to High Court rulings, the policy should be amended to make an additional allowance for the backlog of unmet net additions to the housing stock.	No	The Council has considered this issue in detail through its Planning for Housing Growth Technical Report. The “shortfall” referred to has been accounted for through the setting of a housing target for the period from 2010 onwards. The Council is mindful of the abolition of the RSS since the Preferred Options consultation, and hence the ability of local authorities to set their own housing targets. The Council remains comfortable with its position regarding this matter.
Housing needs and targets	B5.11 f)	Will these plans (and targets) be revised when details of the 2011 Census are available, which may alter the forecast of population growth significantly?	No	It is noted that the 2011 Census results will provide population estimates and forecasts which may differ from those currently available. However, it is not considered appropriate to await these results, and the Council has prepared its Core Strategy on the most robust and up to date information available.
Housing needs and targets	B5.11 g)	There is potential concern about population change, leading to overcrowding and congestion, particularly with continued migration, and potential impacts on	No	Population change has been considered in detail as an issue for the Core Strategy to account for. As noted

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		food, quality of life, accessibility of green and open spaces. The Council should be addressing this far more important factor at a local level rather than a Core Strategy where another 7,000 new houses are to be built, plus the provision of sites and premises for new employment development.		previously, overall population is not expected to grow significantly within Knowsley, with housing pressures arising from changing household sizes and structures.
Housing needs and targets	B5.11 h)	It is acknowledged that in setting the housing target for the Borough a balance will need to be sought between the level of housing growth to be planned for, and the impacts on the Knowsley Green Belt. Sites identified for potential release need to be considered carefully in respect of whether release of individual sites would or would not erode the purposes of the Green Belt in that location as specified by PPG2. It is clear that there are a number of potential Green Belt sites that satisfy the various tests of PPG2 for release which can potentially accommodate more growth than has currently been targeted for.	No	Noted and welcomed. The Council remains satisfied with the estimations of housing and employment growth which could be accommodated within Green Belt locations, as set out within its evidence base.
Housing needs and targets	B5.11 i)	Support is given for the proposed overall strategic housing requirement of 7,650 new dwellings net of clearance. This figure is consistent with the findings of the most up to date evidence regarding housing need, including that which informed the production of RSS. Consistent with Policy L4 of RSS and in the spirit of the Government's Plan for Growth agenda, this figure should be treated as a minimum housing requirement; this should be reflected in the wording	Yes	Noted and welcomed. Clarification will be added to the policy wording indicating that the annual housing target should be treated as a minimum.

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		of CS3.		
Housing needs and targets	B5.11 j)	Objection is made to the housing target set at an annual average of 450 dwellings per annum and the suggestion is made that this section be reworded to an annual average of at least 540 dwellings per annum over the plan period. This represents an additional 20% over the RSS figures.	No	The Council is content with its position regarding its overall and annual levels of housing growth. Its approach to consistency with RSS policy is explained within its Planning for Housing Growth Technical Report.
Housing needs and targets	B5.11 k)	It is agreed that the release of approximately 11,000 Ha of Green Belt land to accommodate an annual housing target of 1,048 would not necessarily be appropriate or sustainable; however, it is considered that due to the existing backlog and the massive housing demand as identified by the SHMA, that a higher figure of 525dpa would be more appropriate. The higher figure would also be more appropriate as the projections based on the proposed housing target do not take into account the shortfall in housing delivery experienced in Knowsley since 2003. There is already an existing deficit of over 1,500 homes, which has been further compounded by the recent historically low housing delivery	No	As explained above, the Council's position regarding housing growth is set out within its Planning for Housing Growth Technical Report. The Council is content that its levels of housing growth are the most appropriate in the given circumstances, accounting for available evidence.
Housing needs and targets	B5.11 l)	The wording of this section could be much more positive and encouraging for developers and would therefore align more closely with the Governments 'pro-growth' agenda and the NPPF	No	The Council considers its policy wording is sufficiently positive regarding housing growth, recognising likely levels of delivery. The Council will produce statements of its compliance with the NPPF and the

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
Housing land supply	B5.12 a)	It is considered that the Council has over-estimated the likely deliverability of sites identified by the Strategic Housing Land Availability Assessment (SHLAA) but the degree of shortfall cannot be quantified from the current information. That a discount has been placed on the total supply to recognise potential non-deliverability is welcomed, as this is in accordance with the guidance set out in the draft NPPF.	No	pro-growth agenda. Noted. The methodology for the SHLAA, including its discounting, reflects the best approach to estimating housing land delivery within Knowsley, given the available evidence. This is also supported by a consortium of housebuilders through the Housing Market Partnership.
Housing land supply	B5.12 b)	No contribution to housing supply should be assumed for urban greenspace, Council asset reviews, increasing residential densities, conversions, re-use of empty houses and changes in vacancy rates, or contributions by neighbouring authorities. Beyond the contribution already included within the SHLAA, any contribution of these sources within the plan period is highly speculative and uncertain, and should not be relied on for policy-making. In addition, no allowance should be made for potential re-allocation of employment land for residential uses.	No	The Council has a robust evidence base in place for the potential contributions from additional sources of land, particularly existing open spaces. The Council has sought to incorporate flexibility in estimations of additional housing supply from other sources, including reallocations and increased densities, and is satisfied that this is an appropriate approach, as set out in the Planning for Housing Growth Technical Report.
Housing land supply	B5.12 c)	Objection is made on the basis that the policy should seek to ensure a minimum five year supply of housing land is maintained, plus an allowance of at least 20%, to ensure compliance with the draft National Planning Policy Framework	No	The Council's approach to identifying a five year supply of housing land has been in accordance with the adopted national planning policy and guidance at the time at which the SHLAA was produced. Updates to the SHLAA will

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				account for the guidance set within the NPPF. It should also be noted that the Council also discounts 20% of its identified supply through a risk assessment process.
Housing land supply	B5.12 d)	The footnote relating to five-year supply should be amended to read at least 540 dwellings in line with the Governments Draft NPPF which requires Councils to plan for at least 20% over existing housing targets	No	See explanation above.
Housing land supply	B5.12 e)	It is considered unlikely the Council will be able to demonstrate a five year housing land supply at present based on housing land supply within these regeneration priority areas. As a result, the Council should provide a mechanism for releasing Green Belt land for residential development that has been identified as a reserved location	No	The Council has already planned for its likely shortage of housing land through its approach to identifying locations within the Green Belt for longer term housing growth. The Council has provided a clear mechanism for the release of such locations in Policy CS5.
Distribution of new housing	B5.13 a)	Support is given for the Preferred Option CS3, in particular the indicative distribution of new housing	No	Noted and welcomed.
Distribution of new housing	B5.13 b)	As far as possible development that cannot be accommodated satisfactorily within the urban area should come forward in mixed use urban extensions in accessible locations well related to the existing communities.	No	Noted. The Council recognises the role and value of mixed use developments in planning urban extensions. All larger urban extensions are likely to be subject to master planning at a later date or in association with a planning

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Distribution of new housing	B5.13 c)	The fact that the boroughs population is located on one third of land in the borough is a potential problem for CS3. Evidence indicates that Kirkby has seen unprecedented levels of house building over the past 20 years and not seen since the 1950s. The deliverability of the policy should be considered as part of the Core Strategy examination.	No	application. It is noted that Knowsley’s populated areas occupy around one third of the land in Knowsley. Recent successes in delivering new housing in Kirkby are also recognised. However, the Council does not consider either of these matters to be a barrier to deliverability of the strategy.
Distribution of new housing	B5.13 d)	The identified distribution of housing across the Borough is supported, including 40% to be delivered within Huyton and Stockbridge Village. This reflects Huyton’s position within the settlement hierarchy and its ability to support growth in a sustainable manner. The need to deliver the regeneration of North Huyton and Stockbridge Village as part of the overall objective of delivering a more balanced housing market is not contested. However, in order to deliver a truly balanced housing market across the whole of Knowsley, the Core Strategy must support limited housing growth within stronger housing market areas, e.g. South Huyton. This will assist in growing the stock of higher value housing in Knowsley.	No	The recognition of the role of Huyton and Stockbridge Village in delivering housing in Knowsley is welcomed. The role of sites within South Huyton with potential for housing development is recognised through the SHLAA process.
Distribution of new housing	B5.13 e)	There are significant reservations about the ability of weaker housing market areas such as North Huyton and Stockbridge Village, to deliver the overall level of housing growth allocated to the area	No	The scale of development planned in North Huyton and Stockbridge Village is in accordance with the permissions and master plans in place for these

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		(i.e. 3,060 dwelling net of clearance). Many sites within these areas are constrained by their historic uses and the viability of their development, particularly in the current economic climate, is marginal. Failure to deliver sufficient levels of housing within the urban area will put the Council under pressure to release less sustainable sites. To avoid this pressure and the resultant unsustainable spatial pattern of growth, it is vital that the Core Strategy supports targeted growth in more stable housing market areas which provide more certainty of delivery		areas. The constraints to delivery in the short term are recognised within the Core Strategy. The Council has sought a balance between protecting urban regeneration priorities while maintaining a sufficient supply of housing land Borough-wide.
Distribution of new housing	B5.13 f)	Objection is made to the over-reliance on Huyton and Stockbridge Village for housing delivery that is not justified by the evidence base. In order to cater for the full range of housing needs and ensure a continuous supply of deliverable housing sites, Prescott, Whiston, Cronton, Knowsley Village and Halewood should be identified for a higher share of growth	No	The Council is satisfied with its position regarding the distribution of housing growth around the Borough. This is explained in the technical reports which support the Core Strategy.
Distribution of new housing	B5.13 g)	Knowsley must address its growth needs as a whole, looking at the future needs of the Borough, as well as current needs. As the urban area is relatively constrained, sustainable development on land adjoining the urban area, such as in Halewood, would help to address this issue and ensure a sufficient amount of land for housing in the future.	No	Noted and agreed.
Distribution	B5.13 h)	Broad support is given to Preferred Option CS3,	No	As noted above, the Council is

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of new housing		however it is suggested that the broad indicative distribution of new housing development to be delivered should provide a greater proportion within the area of Halewood. The Preferred Options consultation document appears to distribute the residential provision in a proportionate way. Though the actual numbers are not made explicit, the Core Strategy proposes 7,600 dwellings for the District over the plan period with 1,147 dwellings in Halewood. This does not amount to a strategy, as there is no conscious shift in the existing situation proposed to address what the evidence says about parts of the District at present, or to help bring about any particular role for Halewood in the future. A greater proportion of the plan's District housing provision should be directed to Halewood in the plan than would simply maintain the existing pattern		satisfied that the proportion of housing growth directed to Halewood is appropriate and adequately meets the spatial vision set as part of the Core Strategy. The approach to housing distribution is justified in the Council's evidence base and technical reports.
Distribution of new housing	B5.13 i)	The overall Borough provision should be at least what it is, and could be higher to reflect the appropriateness of provision at Halewood, and the attractiveness of Halewood to the market, the growth agenda of the Draft NPPF, and the practicality of meeting the '5 year supply plus 20%' rule which is approaching	No	As above, the Council's approach to Halewood's housing growth and compliance with the NPPF are considered to be appropriate.
Distribution of new housing	B5.13 j)	Objection is made as the distribution of housing for Halewood should be much higher. CS1 confirms the existing settlement hierarchy and places Halewood as a larger suburban centre. Given this, it	No	As above, the Council is satisfied that the proportion of housing growth directed to Halewood is appropriate and adequately meets the spatial

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		is unclear as to why Halewood should not have at least as much planned housing as Kirkby at 20% given the lack of evidence presented by the Council to support this. Therefore, the planned distribution of 15% of total new housing for Halewood should be amended to at least 20%. These figures should also be seen as indicative only and as a guide to developers		vision set as part of the Core Strategy. The approach to housing distribution is justified in the Council's evidence base and technical reports.
Housing and Green Belt / other housing sites (see also CS5)	B5.14 a)	Support is given for the conclusion of the Council that significant Green Belt releases are required to meet any reasonable housing requirement for the Borough	No	Noted and welcomed.
Housing and Green Belt / other housing sites (see also CS5)	B5.14 b)	The need for an immediate, major boost in housing development in Knowsley is critical. To achieve this, appropriate release of some Green Belt sites must be considered. The site adjacent to the proposed Epicentre NW at Knowsley is not only felt to be appropriate for release, but would also assist in delivering significant investment and jobs into the area, that would benefit the local community and Borough as a whole.	No	The Council is satisfied that its approach to release of Green Belt sites for development, in accordance with a trigger mechanism based on land supply, is the most appropriate. It is also satisfied that its evidence-based approach to the identification of Green Belt locations to accommodate future growth has resulted in the selection of the most appropriate locations.
Housing and Green Belt / other	B5.14 c)	The Core Strategy proposes a release mechanism to manage the switch of housing development location from urban area to Green Belt. However,	No	The trigger mechanism to manage the release of Green Belt land for future development is robust and effective in

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housing sites (see also CS5)		there are number of concerns as to how the release mechanism is proposed to operate		the Council's view. This is based on recognising the need to release Green Belt land only when the urban land supply is very limited.
Housing and Green Belt / other housing sites (see also CS5)	B5.14 d)	The Council should not consider land in the Whiston area as potential sites for housing development in the future	No	The Council has identified opportunities to the south of Whiston to expand the urban area. This is based on a robust evidence-based approach to the selection of locations which could be suitable for such development. The Council is satisfied that the land to the south of Whiston is one such location.
Housing and Green Belt / other housing sites (see also CS5)	B5.14 e)	The South Prescott Action Area or part thereof should not be reallocated for residential uses	No	The Council has had to reconsider the flexibility of delivering new development with the South Prescott area, based on a lack of delivery of employment development on the previously designated South Prescott Action Area. The Council is also considering Knowsley's wider development needs, and is responding to indications that residential development is more likely to represent a feasible and deliverable development solution for the area.
Housing and Green Belt /	B5.14 f)	Re: Bank Lane, Kirkby Green Belt site - If developed for housing it would create a contiguous	No	The delivery of new housing within the Green Belt location at Bank Lane is

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other housing sites (see also CS5)		urban link into Melling / Sefton and be an over development of this area of Kirkby		one of the evidence-based solutions to the need to identify additional sources of housing land within Knowsley. The Council believes that this area represents a valuable opportunity to create new homes in the Kirkby area, and does not agree that this would represent over development. The site does not directly adjoin urban areas of Sefton, and therefore would not join together communities.

Policy CS4: Economy and Employment	
List of respondents	
<ul style="list-style-type: none"> Mr Jermaine Daniels (ID: 370866) , Merseyside Environmental Advisory Service (MEAS) Mr Tony Docherty (ID: 545201) , Weston House Mr Andrew Leyssens (ID: 370943) , United Utilities Property Services Ltd (ID: 588785) , Junction Property Limited (ID: 588436) , Spencer Industrial Estates Limited 	<ul style="list-style-type: none"> Mr Neil Scales (ID: 588428) , Merseytravel (ID: 588564) , Remondis UK Limited Christine Duffin (ID: 588372) , Homes and Communities Agency Ms J Bennett (ID: 560023) (ID: 556276) , Prescot Business Park Limited Mr M Harker (ID: 370883) , The Stanley Estate and Stud Co

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General	B5.16 a)	Policies in relation to maximising regeneration opportunities are supported. The reuse of vacant property and emphasis on brownfield sites within the document is of great value	No	Noted.
General	B5.16 b)	Support is given to the policy objectives, particularly the emphasis on enhancing the quality of existing employment areas	No	Noted.
General	B5.16 c)	Support is given to the general aims of CS4. In particular, support is given to the aims of meeting the employment needs of established and emerging market sectors, and encouraging mixed use employment/residential scheme.	No	Noted.
General	B5.16 d)	Regarding the 'Town Centre' Employment Uses, whilst the sequential approach to site selection for retail, leisure and office development is in line with	Yes	The Council is satisfied that the sequential approach is in accordance with the NPPF, following the addition of

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		<p>national guidance, the Core Strategy should acknowledge the need for some flexibility when assessing individual sites to establish the potential for ancillary uses to support or enable greater levels of employment development. The cross-subsidy generated by the inclusion of such uses can assist in the delivery of wider employment development. Whilst the justification text states that employment sites need to be safeguarded against residential development, mixed development of such land to include a range of alternative uses and ancillary facilities should be promoted as a means to enable wider employment development.</p>		<p>“The sequential approach, however, will not be required to be undertaken where the office use is ancillary to other employment uses...” to Part 6 of CS4 "Town Centre" Employment Uses - Retail, Leisure and Offices.</p> <p>The need for consistency with the NPPF is considered to preclude the level of flexibility suggested in terms of other main town centre uses.</p>
General	B5.16 e)	<p>Various aspects of national and regional planning policy allow for and promote the review of historic employment sites. This is firmly reinforced in the draft National Planning Policy Framework. This element of CS 4 which seeks to protect all current or allocated employment sites from alternative types of development and land uses is inappropriate and too restrictive. It fails to recognise that there are many reasons why redevelopment of current, historic or allocated employment sites for alternative uses is appropriate and desirable - e.g. to secure regeneration and the effective recycling of previously developed urban land; to secure environmental and physical improvements; to assist in the delivery of new homes and reduce the need</p>	No	<p>The safeguarding of employment land is necessary in order to reduce the requirement of additional Green Belt land for employment purposes over the plan period. Policy CS4 Part 7 does, however, allow for changes to other types of development, e.g. where there is no current or likely future demand for employment uses on the land; or where other uses would bring wider regeneration, environmental or amenity benefits.</p>

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		for release of Green Belt; to generate funds for the relocation of existing businesses; in recognition of the fact that many historic employment sites are not fit for purpose or do not meet the requirements of the market. It therefore represents an unreasonable burden and constraint to development.		
General	B5.16 f)	A short-coming in the Joint Employment Land and Premises Study is that there is an inconsistency between the quality of employment land in Knowsley and the limited number of sites recommended for de-allocation. 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	No	The Council is satisfied that the employment land supply identified in the Joint Employment Land and Premises Study (JELPS) is realistic and deliverable in the context of the requirement for sustainable economic growth in the NPPF. JELPS assessed the condition of each site using a consistent sites scoring system (appendix 26) considering constraints, services availability, environmental setting, etc. The report found a range in the quality of sites. Although the report recognised that quality of the site will affect its marketability, the report arrived at what it considered to be a realistic employment land supply (Table 100) mindful of historic take up rates. Furthermore the Council's intention is to pursue a policy approach whereby the range and quality of sites are improved, with particular emphasis

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				<p>upon the remodelling of poorer quality sites in regeneration priority areas such as Knowsley Industrial and Business Parks.</p> <p>Notwithstanding the above, sufficient flexibility is provided within CS 4 to account for circumstances where there is no current or likely future demand for employment uses on the land; or where other uses would bring wider regeneration, environmental or amenity benefits. The need for potential flexibility in the strategic employment land supply is reflected in the inclusion of four of the nine Green Belt broad locations in CS5 which have potential to be utilised for employment development to meet future needs (if required).</p>
General	B5.16 g)	CS4 is broadly compatible with the Waste DPD.	No	Noted.
Employment land needs and targets	B5.17 a)	<p>An independent market review of employment trends and the supply/demand position for employment land in Knowsley concludes:</p> <ul style="list-style-type: none"> • That there will be a continuing trend towards a need for large, single user buildings in Merseyside, particularly for logistic purposes. The location of such buildings will be biased 	No	The Council is satisfied that the employment land supply identified in the Joint Employment Land and Premises Study (JELPS) is realistic and deliverable in the context of the requirement for sustainable economic growth in the NPPF and historic take

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		<p>towards the M6, M62 and M57 corridors. The M57 corridor is particularly important given the direct link to the expanding Port of Liverpool and the investment potential that this brings</p> <ul style="list-style-type: none"> • That the supply of suitable floorspace to meet projected demand is limited (unit of over 100,000 sq ft). The ready availability of suitable sites to meet demand is vitally important for occupiers and developers alike. There is predicted to be a shortfall of suitably located and readily available sites in Merseyside in general and in Knowsley in particular in the period to 2027. 		<p>up rates.</p> <p>The employment land supply in the Local Plan has necessary flexibility to account for future needs arising through the inclusion of four of the nine Green Belt broad locations in CS5 which have potential to be utilised for employment development to meet future needs (if required). Of these sites, the remodelling of Knowsley Industrial and Business Parks and the Cronton Colliery site appear potentially suitable to accommodate units in excess of 100,000 sq.ft and are in close proximity to the M57 and M62 corridors.</p> <p>With regard to the above, the Council supports sustainable economic growth and is mindful of the investment potential resulting from the Port of Liverpool expansion. Nevertheless the approach to employment land supply and land identification must remain proportionate and deliverable, noting that the identification of additional land requirements would put increased</p>

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				<p>pressure on the Green Belt and therefore must be founded on robust evidence with a degree of certainty to ensure deliverability during the plan period. In this regard, development rates significantly above historic take up rates are extremely speculative at this stage and are a complete contrast to the scale of take up currently being experienced.</p> <p>Employment land supply also needs to be assessed having regard to the sub-regional context including the findings of the Liverpool City Region Housing and Economic Development Evidence base Overview Study. The employment land targets in policy CS4 have been adjusted partly in response to the findings of this study. For reasons set down in the Technical Report “Planning for Employment Growth” the approach to employment land supply issues in Knowsley is considered appropriate having regard to this wider context.</p>
Employment land needs	B5.17 b)	To meet the employment aims of the Council, it is important that the land needs of targeted	No	The Council is satisfied with the approach to employment development

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and targets		employment sectors are met. Different sectors of the employment market have very different requirements in terms of accessibility and site characteristics. An undue emphasis on quantity of total provision is likely to lead to those various requirements not being met, with the consequent loss of potential employment opportunities to Knowsley. Large mixed use developments can play a major role in reducing the need to travel and are encouraged by national policy.		and employment land supply, noting it reflects NPPF requirements in terms of sustainable economic growth. Furthermore the NPPF is clear that investment in employment should not be burdened by planning policy requirements and expectations. In this regard, it is considered that the apportionment of particular uses to specific locations is not sufficiently flexible to support the NPPF objections, nor would it be appropriate in a strategic document such as the Local Plan Core Strategy. Nevertheless the Council’s approach should not be interpreted as focusing upon quantity alone. The identification of remodelling opportunities within Knowsley Industrial and Business Parks, together with broad locations for Green Belt release via the Local Plan are intended to secure a sufficient range, choice and quality of sites to ensure sufficient flexibility for and to secure investment across a variety employment sectors, with sufficient flexibility to account for rapid changes in economic circumstances.

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				<p>The suitability of employment land supply to accommodate target employment sectors within the Council’s Economic Regeneration Strategy is assessed within the Planning for Employment Growth Technical Report.</p>
Employment land needs and targets	B5.17 c)	<p>Policy CS4 states that the Council will identify 216.5ha of land for employment use between 2010 and 2027 and the use of the long term historic take-up rate as the basis for the projection of employment requirements over the plan period is supported. However, it is suggested that an element of 20% should be added to the historic take-up rate to allow for range and choice and the ‘churn’ factor. A further 20% should be added to allow the Council to plan proactively for uplift on historic take up rates. Therefore the Core Strategy should provide for an employment provision of at least 311.76ha. An additional element should also be included to allow for a full 15-year supply after the expected date of adoption. The only reason not to provide this amount would be if such land releases that would harm essential purposes of the Green Belt. This is because:</p> <ul style="list-style-type: none"> It is highly unlikely that all the employment land identified will be developed within the plan 	Yes	<p>The Council is satisfied with the approach to employment development and employment land supply, noting it reflects NPPF requirements in terms of sustainable economic growth. The Council does however acknowledge that in circumstances where sufficient employment land were available within the urban area on previously developed land or greenfield sites, then a flexibility factor of 20% would be appropriate to apply to account for the flexibility of a proportion of sites above take up rates not being delivered and churn. However it is clear that any additional land requirements beyond those identified would increase the pressure for land release in the Green Belt, with no suitable sites being available without compromising the</p>

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		<p>period for a mixture of deliverability reasons, including ownership, physical and marketing factors. Therefore, to provide a land supply equivalent to past take-up, would mean in practice that those take-up rates would not be achieved over the plan period</p> <ul style="list-style-type: none"> • There is a need to provide developers and occupiers with a degree of range and choice and also to provide some ongoing supply at the end of the plan period. • The RSS endorses the use of a flexibility factor of 20%. Equally, the Joint Employment Land and Premises Study produced by BE Group for the Council also proposes a 20% flexibility allowance, partly to reflect the CLG Employment Land Review guidance which "suggests a buffer is needed to allow for churn, and to allow for continuing range and choice." • The basis on which the 20% flexibility factor has not been applied is flawed. There is no reason to dismiss a requirement just because it is "high" if it is properly justified and in accordance with guidance and best practice. Equally the Council's position ignores the fundamental purpose of the flexibility factor which is to ensure that development plans allow for the maintenance of at least past rates of economic development. 		<p>essential purposes of including land within the Green Belt. To account for such difficulties and provide a degree of mitigation, the Council has included a degree of flexibility in the broad locations identified in CS 5 to account for changes in employment demand during the plan period. In this regard, the take up rates in the early part of the plan period will dictate the extent to which additional employment land may be required, with such circumstances dictating whether certain locations are utilised for employment or residential development. This provides a proportionate safeguard by not strategically restricting the land use of the site thereby allow delivery to respond to market signals, as opposed to creating an overestimation of land requirements which would subsequently harm the Green Belt through release of unsuitable land. In this regard, it should be noted that the flexible approach does not compromise the Council's ability to meet its needs during the plan period. The consequences of utilisation of dual</p>

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		<ul style="list-style-type: none"> The long-term rate used (12.73 ha per annum) is an average over some 13 years but is unduly influenced by Knowsley's poor performance since 2003/04. The Council fully accepts that this poor performance is mainly due to a lack of deliverable attractive sites. From this, it follows that if a good quality supply is now produced by the Core Strategy, long-term take-up rates can be increased significantly over the plan period. In addition, a policy to increase take-up rates would be consistent with PPS4, which urges the need to build prosperous communities by "improving" economic performance, and in particular to reduce the gap in economic performance rates. This focus on proactively planning for growth is reflected across a range of policies, including the draft NPPF, RSS, and the Government's pro-growth agenda. 		<p>Green Belt sites for employment purposes alone, would only serve to accelerate the trigger mechanism for otherwise safeguarded residential sites.</p> <p>Notwithstanding the above, the Council's approach should not be interpreted as focusing upon quantity alone. The identification of remodelling opportunities within Knowsley Industrial and Business Parks, together with broad locations for Green Belt release via the Local Plan are intended to secure a sufficient range, choice and quality sites to ensure sufficient flexibility for and to secure investment across a variety employment sectors, with sufficient flexibility to account for rapid changes in economic circumstances.</p> <p>Specific justification for the calculation of employment requirements, together with the scenarios discounted is included within the Planning for Employment Growth Technical Report.</p>
Employment	B5.17 d)	There is no document which seeks to assess	No	The Council is satisfied with the

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land needs and targets		whether the land supply - either existing or proposed - would be suitable for target sectors or facilitate their growth. If the Council had carried out this more detailed analysis, it would have shown that Knowsley's existing and proposed supply is deficient in sites appropriate for the following: Large logistics and distribution users; Advance manufacturing and knowledge-based industries, including research and development; and High amenity business parks.		approach to employment development and employment land supply, noting it reflects NPPF requirements in terms of sustainable economic growth. In this regard, the Planning for Employment Growth Technical Report provides an assessment of the suitability of employment land supply relative to priority employment sectors within the Council's Economic Regeneration Strategy.
Distribution of employment land	B5.18 a)	Sustainable location of employment opportunities is critically important. It should be ensured that these are only located where existing public transport and other sustainable modes are available, or failing this, where public transport and other sustainable modes can be easily introduced. In the latter instance the costs of new public transport and other sustainable transportation requirements will need to be borne as part of the overall development costs. The importance of sustainable access to employment via modes other than the car was reflected in Local Sustainable Transport Fund (LTSF) bid and is an integral part of the LTP so the Core Strategy needs to encompass this to control / direct the release or maintenance of employment land	No	Noted. The Council considers that the identification of strategic employment locations and employment land supply accords with the principles of sustainable economic growth, including with regard to locational suitability relative to sustainable modes of travel.
Distribution	B5.18 b)	The identification of Knowsley Industrial Park,	No	Noted.

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of employment land		including Knowsley Business Park as a first priority for the development of employment uses is supported		
Distribution of employment land	B5.18 c)	<p>The preferred employment distribution is mismatched to housing, with both Kirkby at 51% and Prescott at 26.7% having additional employment land in excess of the housing allocation. In the case of Kirkby employment provision represents 51% of the Borough total whilst it only represents and receives 20% of the housing provision. Both Huyton at 10.6% and Halewood at 11.8% are under provided for in employment terms. No additional sites are identified in Halewood, above existing provision and the single allocation. When compared to housing provision, Halewood receives 15% 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 make no attempt to address the geographical imbalance of the existing employment provision; in fact it exacerbates the problem because it identifies the majority of new employment land in both Kirkby and Prescott. It is therefore questioned why the Council appears to have not taken the opportunity to review the existing allocations for these townships that have an oversupply of employment land relative to</p>	No	<p>The Council considers that selection of housing growth as a method upon which to base employment land distribution over other indicators such as working age population, levels of unemployment, etc. would be arbitrary.</p> <p>In distributing employment land, the Core Strategy must take into consideration the policy objectives and other policies. The Core Strategy seeks to encourage and maintain sustainable economic and employment growth (Strategic Objective 1); and to regenerate and transform areas of social and economic deprivation so they become more sustainable ... narrowing the gap between the richest and poorest communities (Strategic Objective 3).</p> <p>The Core Strategy should also not undermine regeneration initiatives in the surrounding districts.</p> <p>The focus upon regeneration priorities</p>

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		<p>housing provision. Specifically, examination has been undertaken of the location of existing allocations, and whilst the majority are within existing employment areas and appear logical employment sites, they include nine greenfield sites of which five are located on the periphery of Knowsley Industrial Park. It is questioned why these sites have automatically been included in the supply figures, given the apparent over provision of employment land in the Kirkby township. Again this situation is further compounded with the new proposed allocations, when both Huyton (the largest township) and Halewood both have an apparent undersupply. 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.</p>		<p>in Knowsley Industrial and Business Parks is intended to marry opportunity with need. This is noting that it comprises the largest mainly industrial area within the Liverpool City Region and the second largest in the North West region. As a consequence, Knowsley Industrial and Business Parks are strategically positioned in terms of their proximity to major transport infrastructure, including the M57 and the A580, the presence of a Rail Terminal and the proximity to the North West region's major airports. The sheer scale and critical mass is a key driver of the sub-regional economy and as such, the economic vitality of the park is crucial to the prosperity of not only Knowsley, but also the Liverpool City Region. In this regard, the Joint Employment Land and Premises Study, identified the remodelling of the Parks as a requirement to ensure economic</p> <p>In this context, the Council does not consider it is appropriate to assess employment provision requirement</p>

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				<p>based upon an equal distribution specific to a single settlement or identify spatial oversupply on this basis, given Knowsley Industrial and Business Parks offers employment opportunities for all Knowsley residents and the wider sub-region. This rationale similarly applies to other major employers and employment areas such as Whiston Hospital, Kings Business Park (Huyton), Huyton Business Park, Jaguar Land Rover (Halewood), together with the proposed Green Belt release at Cronton Colliery which are distributed throughout Knowsley and provide opportunities for all residents, not just the immediate settlement within which they are located.</p> <p>In this regard, the employment land provision available for Halewood and Knowsley residents cannot be viewed in spatial isolation. Halewood is located very close to employment areas in Liverpool (e.g. Speke) and Halton (e.g. 3MG). It is considered that the South Liverpool International Gateway</p>

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				<p>Strategic Regeneration Framework in particular, an area contiguous with Halewood, will be able to meet some of Halewood’s employment needs.</p> <p>South Liverpool International Gateway site and the strategic employment site at 3MG in Widnes both remain regional strategic investment priorities in accordance with RSS (as identified by Liverpool and Halton UDPs and their emerging Local Plans respectively). As a consequence, there is a need to consider the potential effect of additional employment land within Halewood, which could undermine these regeneration priorities given the functional linkage between these areas.</p> <p>In addition, there are no suitable Green Belt locations within Halewood which would not harm the purposes of including land within the Green Belt. This is noting that the broad locations to the east of Halewood identified in CS 5 remain more appropriate and deliverable for residential development</p>

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				<p>being congruous with existing residential areas and in close proximity to community and retail facilities, together with identified developer interest.</p> <p>Consequently the constraining factors relating to localised need and availability reduce any argument for Green Belt release to provide additional employment land around Halewood.</p>
Distribution of employment land	B5.18 d)	<p>The amount of employment land provided for at Halewood is clearly inadequate. The amount provided for at Halewood in total should be at least equivalent to what will be the proportion of the population resident at Halewood, whereas it will be a lot less, and this includes provision that is at best inflexible and may not be generally available. Achieving an amount at least equivalent to the distribution of housing would reflect the importance of Halewood as an employment area and lead to a more balanced supply across the Borough</p>	No	<p>The Council considers that the selection of population upon which to base employment land distribution over other indicators such as working age population, levels of unemployment, etc. would be arbitrary.</p> <p>Although the “Overview Study” concluded that the surrounding districts could not directly meet Knowsley’s development needs, the employment land provision available for Halewood and Knowsley cannot be viewed in spatial isolation. This is noting the proximity to employment areas in Liverpool (e.g. Speke) and Halton (e.g.</p>

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				<p>3MG).</p> <p>In this regard, it is considered that the South Liverpool International Gateway Strategic Regeneration Framework in particular, an area contiguous with Halewood, will be able to meet some of Halewood’s employment needs. This is noting that South Liverpool International Gateway site and the strategic employment site at 3MG in Widnes both remain regional strategic investment priorities in accordance with RSS (as identified by Liverpool and Halton UDPs and their emerging Local Plans respectively). In this regard, there is a need to consider the potential effect of additional employment land within Halewood, which could undermine these regeneration priorities given the functional linkage between these areas.</p> <p>In addition, there are no suitable Green Belt locations within Halewood which would not harm the purposes of including land within the Green Belt.</p>

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
				<p>This is noting that the broad locations to the east of Halewood identified in CS 5 remain more appropriate for residential development being congruous with existing residential areas and in close proximity to community and retail facilities, together with clear developer interest.</p> <p>Consequently the constraining factors relating to localised need and availability reduce any argument for Green Belt release to provide additional employment land around Halewood.</p>
Distribution of employment land	B5.18 e)	<p>Jaguar Land Rover (Halewood) is identified as a priority for employment, but no further land is allocated for employment purposes at Halewood to supplement the existing allocation. This existing allocation (18.44 ha) at Eastern Compound is land owned by Tata held for Jaguar expansion and is consequently not available for other potential employers. This position effectively leaves Halewood with no additional or alternative employment 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</p>	No	<p>The Council considers that the Core Strategy should not undermine regeneration initiatives in the surrounding districts.</p> <p>Although the “Overview Study” concluded that the surrounding districts could not directly meet Knowsley’s development needs, the employment land provision available for Halewood and Knowsley cannot be viewed in isolation. This is noting the proximity to employment areas in Liverpool (e.g.</p>

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		attracted to premises in close proximity to the car plant.		<p>Speke) and Halton (e.g. 3MG). In this regard, it is considered that the South Liverpool International Gateway Strategic Regeneration Framework in particular, an area contiguous with Halewood, will be able to meet some of Halewood’s employment needs.</p> <p>The South Liverpool International Gateway Strategic Regeneration Framework provides a strategic vision for the Speke and Garston area of Liverpool. The report states that the “International Gateway has a total of 129.16 hectares of available employment land and could provide for shortages in supply in Knowsley”. This is noting that South Liverpool International Gateway site and the strategic employment site at 3MG in Widnes both remain regional strategic investment priorities in accordance with RSS (as identified by Liverpool and Halton UDPs and their emerging Local Plans respectively). In this regard, there is a need to consider the potential effect of additional employment land within Halewood,</p>

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				<p>which could undermine these regeneration priorities given the functional linkage between these areas.</p> <p>In addition, there are no suitable Green Belt locations within Halewood which would not harm the purposes of including land within the Green Belt. This is noting that the broad locations to the east of Halewood identified in CS 5 remain more appropriate for residential development being congruous with existing residential areas and in close proximity to community and retail facilities, together with clear developer interest.</p> <p>Consequently the constraining factors relating to localised need and availability reduce any argument for Green Belt release to provide additional employment land around Halewood.</p>
Distribution of employment land	B5.18 f)	It is considered that Knowsley's employment land supply lacks sites within the key M62 corridor which is one of the prime locations for economic development in the North West Region. This	Yes	The Council from a strategic perspective is focused upon the identification of suitable land within the Green Belt capable of release to meet

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		<p>corridor has experienced high levels of economic growth in recent years. In this regard, the success of the Huyton Business Park off Junction 6 shows the potential of sites which are highly accessible to the M62 motorway. Knowsley also lacks sites which have the potential to share in the future economic growth of the Liverpool John Lennon Airport. Sites off Junction 6 of the M62 motorway provide the opportunity to make up these deficiencies.</p> <p>Therefore the development land to the south-east of Junction 6 is promoted, including the former Cronton Colliery site for employment. This site is well placed to meet demand from many of the key target sectors, has immediate access off the M62 motorway; and, with the development of the land to the north of the motorway for residential, provides the opportunity for a major mixed development, offering sustainable transport links to the rest of Knowsley, including the major concentration of unemployment and deprivation in North Huyton.</p> <p>The site at Junction 6 should be released relatively early in the plan period because of the important contribution it can make to providing a balanced portfolio of employment opportunities, including for large distribution users.</p>		<p>Knowsley’s future development needs which otherwise cannot be met in the urban area. Nevertheless the Council has carefully considered the employment land supply position since the Preferred Options stage noting a number of consents for development of previously allocated employment land for residential purposes, together with the requirements of the NPPF for sustainable economic growth. In this regard, it was considered that the initial phasing proposals were considered too onerous and inflexible to adequately support the promotion of sustainable growth and appropriate employment development to meet Knowsley long term needs. The phasing mechanism has therefore been simplified accordingly within the Local Plan to reflect reserve locations (those required during the plan period) and safeguarded locations (those required to meet needs after 2028). Cronton Colliery consequently is included in the former, however it is the Council’s view that suitable and available urban and previously developed sites remain the</p>

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				prioritised prior to its release in accordance with CS 5.
Employment and Green Belt / other employment sites	B5.19 a)	The Council's approach is to identify locations for Green Belt land release which are considered to be the most suitable taking account of the five purposes for including land in the Green Belt: this approach is too narrow. It is an approach which is unlikely to lead to the most sustainable patterns of development. The advice in the Draft NPPF is that the review of Green Belt boundaries should be guided by the overriding need to promote sustainable patterns of development.	No	A Sustainability Appraisal has been undertaken on sites within the Green Belt to ensure that the sites selected for allocation are in sustainable locations. The Council is satisfied that the findings of the Sustainability Appraisal, support that the Council has selected the best approach and broad locations given the reasonable alternatives. The Council considers that the chosen policy approach is also in compliance with the NPPF.
Employment and Green Belt / other employment sites	B5.19 b)	The review of Green Belt boundaries to meet long term development requirements needs to be based on a thorough understanding of how sustainable patterns of development will be served. From the perspective of employment land, sites need to be identified to best meet the needs of established and emerging market sectors. The identification of well located and available opportunities for employment uses is a key feature of sustainable development.	No	A Sustainability Appraisal has been undertaken on sites within the Green Belt to ensure that the sites selected for allocation are in sustainable locations. The Council is satisfied that the findings of the Sustainability Appraisal, support that the Council has selected the best approach and broad locations to deliver sustainable development given the reasonable alternatives. This methodology and assessment of land within the Green Belt in terms of suitability for release is documented within the Green Belt

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				Study, with additional justification for the policy approach available in the Green Belt Technical Report.
Employment and Green Belt / other employment sites	B5.19 c)	First priority should normally be given to the development of land in the current urban area. However, the most important factor determining timing should be sustainability. In deciding the order of release, the most sustainable sites should be developed first. In certain circumstances this should be sites currently within the Green Belt. Given the scale of the employment and housing requirements of the Borough, some sites should be released from the Green Belt in the early part of the plan period. In this regard, there is a strong case that some of the larger sites currently within the Green Belt should be identified by the Core Strategy as strategic sites within the meaning of PPS12 because they are so central to achievement of its strategy. Other sites should be identified as broad locations for development.	No	The Council is comfortable with its phasing approach, which reflects the most sustainable overall approach to the delivery of new development. The Council disagrees with the approach that locations within the Green Belt should be brought forward in advance of the five year supply trigger mechanism, as it is felt that this would undermine the focus in the early part of the plan period on capitalising on opportunities to deliver regeneration projects within the Borough. The Council does not consider that any locations within the Green Belt should be identified as strategic sites within the Core Strategy, as they are identified to meet local needs, which cumulatively will contribute towards meeting Borough-wide needs, rather than being inately critical to the delivery of the central objectives of the Core Strategy.
Employment and Green	B5.19 d)	All of Site 8 and Site 9 should be included for release early in the plan period, should be shown	Yes	The Council has carefully considered the housing and employment land

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Belt / other employment sites		as a strategic employment site. Development at the South of the area should be linked to that of the land of the north.		<p>supply positions since the Preferred Options stage resulting from updated evidence, new commitments and the requirements of the NPPF. In this regard, it was considered that the initial phasing proposals were considered too onerous and inflexible to adequately support the promotion of sustainable growth and appropriate residential and employment development to meet Knowsley long term needs. The phasing mechanism has therefore been simplified accordingly within the Local Plan to reflect reserve locations (those required during the plan period) and safeguarded locations (those required to meet needs after 2028).</p> <p>Land to the South of Whiston is now included as a reserved location suitable for residential development and due to the absence of phasing Tiers, is no longer sub divided. The justification for the suitability for residential purposes (as opposed to employment use) is included within the Green Belt Study and Green Belt Technical Report. Such justification is</p>

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				<p>supported by developer and land owner interest in delivery of residential development.</p> <p>Cronton Colliery is also included as a reserved location (rather than previously safeguarded), to reflect it now being required to meet Knowsley's employment land needs during the plan period. This is noting the interim loss of employment land supply in other parts of the Borough and to provide sufficient flexibility to ensure delivery of sustainable economic growth.</p>
Employment and Green Belt / other employment sites	B5.19 e)	At Kings Business Park, there are at least 8 vacant properties on this site and one building, as one enters the Business Park, formerly "The Malt College of Learning for Teachers" that has never been used. The waste of ground is unbelievable and is also poorly maintained.	No	The Council is satisfied that the Joint Employment Land and Premises Study provides an accurate assessment of the quality and quantity of employment land available. The density of employment use on site reflect the design requirements, for example, the need for Sustainable Drainage Systems (SuDs) and the constraints of land availability resulting from Tree Preservation Orders (TPOs) and the setting of a Grade II Listed Building. In addition, the site is also designated as

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				<p>Green Belt which constrains any development within the site which will have a materially greater impact on the Green Belt.</p> <p>The limited land availability within Kings Business Park, provides a degree of justification for the need for a successor site to be promoted through the Local Plan. The release of Cronton Colliery from the Green Belt as part of Policy CS 5 is considered to satisfy this requirement.</p>
Employment and Green Belt / other employment sites	B5.19 f)	<p>The South Prescott Action Area or part thereof should not be reallocated for residential uses. There is nothing to gain by doing this, unless it can be demonstrated that Knowsley will meet its forecast housing targets but not its forecast employment land targets during the plan period. The site is highly unsuitable for housing, and evidence indicates it's suitability for employment development, including within the Joint Employment Land and Premises Study, and also when the site was sold in 2010, it was noted that <i>"The sale (of the site) demonstrates there is still a healthy demand in the North West for good quality, well located employment sites of this scale that offer the potential for redevelopment"</i>. The Council's</p>	No	<p>The Council has resolved to approve an outline planning application (subject to a signed Section 106) for "Demolition of existing buildings and mixed use development comprising up to 623 no. residential dwellings, assisted/close care living (use class C2), office development (use class B1), general industrial development (use class B2), storage or distribution development (use class B8), together with open space/greenspace infrastructure; associated roads and infrastructure."</p> <p>The supporting geo-environmental</p>

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		<p>argument that there has been limited interest in redeveloping the land for employment uses is incorrect, particularly due to continued interest in the Tank House site. This site has also recently gained planning consent for use as a Hazardous Waste Facility which will be operational 24 hours a day, and could have impacts on residents sited near to the site, particularly when accounting for the need to segregate housing from heavy industrial uses. Furthermore, the selection of the Tank House site as a hazardous waste facility was decided based on seeking to avoid any detrimental impacts on residential areas which could arise from the industrial operations or from the 24hr operation of the site – its redevelopment for housing could impact upon the viability of the consented operation. It is however noted that bring the wider site up to a standard suitable for redevelopment on a par with the other available employment sites within Knowsley, could involve consider expenditure on site remediation and new infrastructure; which the developers of sites on the other industrial estates in the Borough have not had to take on. This factor is likely to have had an impact upon the level of interest in redeveloping the site for employment use.</p>		<p>assessment states “This preliminary assessment generally confirmed that the area could be redeveloped for a residential end use, subject to the completion of a supplementary phase of detailed intrusive investigation, the development of a comprehensive Remediation Strategy and the incorporation of suitable mitigation measures including ...”</p> <p>The Planning Statement that accompanied planning application 11/00285/OUT stated that “a note produced by Littler Associates summarises the marketing of the site over the past nine months. It is the case that there has been extremely limited interest in terms of traditional B use classes”. It was the view of the owner of the site that “that there is clear marketing evidence to demonstrate that there is no realistic current of future demand for the whole of the site to be developed for employment/economic development.”</p>
Employment and Green	B5.19 g)	Land adjacent to the M57, when viewed alongside the remaining undeveloped land at Axis Business	No	The Council is satisfied it has correctly applied national Green Belt policy

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Belt / other employment sites		Park, will create a substantial and deliverable opportunity which is well positioned to attract occupiers (and employment) to the North West region. It is a location that has particular advantages over the other sites in the Green Belt identified in the Green Belt Study for release to meet long term development needs. These other sites are not nearly as well served by infrastructure and ownership constraints cast doubt over their deliverability.		<p>while undertaking the Green Belt Study. The land parcels comprising the Axis Business Park are within an essential gap between Kirkby and Liverpool. Development within these parcels would significantly reduce this gap and create potential precedent for similar development of the western edge of the Kirkby settlement adjoining the M57. These areas were therefore discounted as inappropriate for Green Belt release at Stage 2 of the Green Belt Study. This is noting that the release of this area of land would be in conflict with national Green Belt policy.</p> <p>In the interest of clarity it should be noted that any benefits of employment provision in this location, would have to be offset against any potential negative implications for regeneration priorities in Knowsley Industrial and Business Parks, particularly investment in the remodelling of previously developed land. In this regard, it is considered that Knowsley’s Local Plan approach to employment land provision provides the most appropriate spatial balance to</p>

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				serve individual settlements during the plan period. As such, the provision of additional land in close proximity to Kirkby is not necessarily a priority given the potential range and choice available in Knowsley Industrial and Business Parks.
Employment and Green Belt / other employment sites	B5.19 h)	The statement that "Knowsley Safari Park should be permitted to continue to evolve and develop as a tourist attraction" is supported. The Safari Park sits within the Green Belt; this raises planning application issues in response to its evolution and development as a tourist attraction. The approach that "there is potential for a more detailed policy focus as part of a Site Allocations and Development Policies DPD..." in respect of the Safari Park is supported. It is important that the Safari Park has the flexibility to evolve to meet changing tourism demands and there is value working with Knowsley Council to develop appropriate policies.	No	Noted.

Policy CS5: Green Belt

List of respondents

- Edward Bean (ID: 584280)
- Mr Andy Frost (ID: 370980) , Jones Lang LaSalle
- Mr Andrew Thorley (ID: 485368) , Taylor Wimpey UK Limited
- Mr Tony Docherty (ID: 545201) , Weston House
- Mr Andrew Leysens (ID: 370943) , United Utilities Property Services Ltd
- Jonathan Parnes (ID: 383054) , Amalcroft Properties
- Jonathan Parnes (ID: 588781) , Knowsley Development Trust
- (ID: 588785) , Junction Property Limited
- Robin Buckley (ID: 389989) , Redrow Homes
- Victoria Murray (ID: 457367) , Redrow
- Mr Simon Clarke (ID: 588426) , Highways Agency
- Mr Neil Scales (ID: 588428) , Merseytravel
- Mr Alasdair Cross (ID: 588381) , Halton Borough Council
- David Holmes (ID: 588375)
- Robert Arnall (ID: 588343)
- Neil Patten (ID: 588373) , Patten Properties Limited
- Tom Hatfield (ID: 588368) , Sefton Metropolitan Borough Council
- Peter Davis (ID: 587093)
- Hannah Whitfield (ID: 588363) , Wirral Metropolitan Borough Council
- Mr Graeme Schlueter (ID: 588360)
- Mr Graham Moorcroft (ID: 588347)
- Mr John Green (ID: 370893) , Halewood Town Council
- Mr DAVID ASPIN (ID: 408207) , Knowsley Age UK / Age Concern
- Mr L Seagraves (ID: 587158)
- Mr Mike Townson (ID: 587152)
- Mrs I G Davis (ID: 587123)
- Mr Marcus Hudson (ID: 560008) , Lancashire County Council
- Mr Russell Mills (ID: 559359) , The Land Trust
- Mr Paul Daly (ID: 389928) , Sport England - NW Region
- Mr Mike Eccles (ID: 370920) , Liverpool City Council
- (ID: 382179) , NV Assets LLP
- Mr Jermaine Daniels (ID: 370866) , Merseyside Environmental Advisory Service (MEAS)
- (ID: 556276) , Prescott Business Park Limited
- Carl Cashman (ID: 559304) , Knowsley Liberal Democrats - Kirkby Branch
- John Benn (ID: 588432)
- Dave Smithson (ID: 588380)
- C Harmer (ID: 588379)
- Debby Murphy (ID: 588376)
- Mr Neil Lancaster (ID: 588364) , LMC Associates Ltd
- Mr David Forster (ID: 543245)
- Mrs Sandra Jaycock (ID: 372072)
- Mrs Lisa Bending (ID: 587259)
- Mrs Nora Haynes (ID: 587256)
- Dr Allan Richardson (ID: 587169)
- Nicola Meredith (ID: 587242)
- Mr R Smith (ID: 587241)
- Mr John Woollam (ID: 587239)
- Mr Gerard Halliday (ID: 587234)
- Kathleen Whitfield (ID: 587231)
- Mr Carl Rowe (ID: 587165)

<ul style="list-style-type: none"> • Ian Smith (ID: 371187) , Knowsley Liberal Democrat Group • Mrs P M Meredith (ID: 587248) • Mr Robert Watkin (ID: 587162) • Mrs Carol Peers (ID: 587226) • Mr T W Bretherton (ID: 587223) , Residents of Foxshaw Close, Windy Arbor Close and Simons Close • Mr David Kent (ID: 587220) • Mr Charles Alfred Daly (ID: 548617) • Mrs Vitti Osborne (ID: 370882) , Cronton Parish Council 	<ul style="list-style-type: none"> • Mr J M Carter (ID: 587216) , Rainhill Civic Society • Mr A G Edwards (ID: 587215) • Mr Barry Nelson (ID: 587150) • (ID: 584313) , Stonston Ltd • Mr M Harker (ID: 370883) , The Stanley Estate and Stud Co • Mr Jason Brown (ID: 584247) • Ms J Bennett (ID: 560023) • (ID: 382179) , NV Assets LLP • Mr John Steven (ID: 559017) • Miss R McGowan (ID: 558998)
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Principles / drivers of Green Belt review / release – <i>Support</i>	B5.21 a)	The Government has acknowledged that for sustainable growth to be driven by private sector investment and enterprise, and the Council adopt the same ethos. The Council must address its growth needs as a whole, looking at the future needs of the Borough, as well as current needs. As the urban area is relatively constrained, sustainable development on land adjoining the urban area would help to address this issue and ensure a sufficient amount of land for housing in the future	No	Noted and welcomed.
Principles / drivers of Green Belt review / release –	B5.21 b)	In the event of extensions of development taking place into the Green Belt, this should only occur where good public transport and access by other sustainable modes exists, or can be readily and easily achieved. If such extensions require new	No	Access and transport considerations have been a central component of selecting and justifying locations for Green Belt release. This is demonstrated in the Council’s

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<i>Support</i>		public transport or other sustainable mode infrastructure / services, the cost of these provisions should be met within the development costs / funding		evidence base. Policy CS 27 outlines the Council’s approach to developer contributions, including that developers should contribute towards necessary transportation and other infrastructure improvements to support their development.
Principles / drivers of Green Belt review / release – <i>Support</i>	B5.21 c)	Strong support is given to the identification of some Green Belt land as reserved and safeguarded locations for future development.	No	Noted and welcomed.
Principles / drivers of Green Belt review / release – <i>Support</i>	B5.21 d)	The proposal to release land from the Green Belt to meet employment and housing requirements is supported. There is no sensible alternative to Green Belt release if the identified requirements are to be met. However, the Council has underestimated land requirements and overestimated land supply. It is noted that the land identified by the Council for release from the Green Belt is in excess of the shortfalls which the Council has identified, providing some opportunity for an increase in housing and employment provision without further impact on the Green Belt.	No	Noted. The Council welcomes support for Green Belt release, as noted this is needed to meet identified development requirements over the plan period. The Council’s position regarding existing supply of land is supported by a robust and credible evidence base, which has been produced in accordance with justified methodologies. The Council considers that an appropriate range of locations within the Green Belt have been identified to meet longer term needs, with the approach incorporating the flexibility required to make the Core Strategy sound.

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Principles / drivers of Green Belt review / release – Support	B5.21 e)	Welcome and support is given to the proposal to identify safeguarded land for development beyond the plan period. Such provision is required to comply with PPG2 which explains that any proposals affecting Green Belts should be related to a timescale which is longer than that normally adopted for other aspects of the plan, and that planning authorities should satisfy themselves that Green Belt boundaries will not need to be altered at the end of the plan period. This will in some cases mean safeguarding land between the urban area and the Green Belt which may be required to meet longer-term development needs.	No	The Council is satisfied that it has incorporated sufficient flexibility within its approach to safeguarding land in the Green Belt for future development. This is based on meeting development requirements arising during the plan period, recognising that need to maintain a flexible position in the longer term. It should be noted that the Core Strategy will be subject to monitoring and if appropriate, review.
Principles / drivers of Green Belt review / release – Support	B5.21 f)	It is welcomed that Green Belt land around Cronton Village will continue to be safeguarded.	No	Noted and welcomed.
Principles / drivers of Green Belt review / release - Objection	B5.22 a)	Inside a Green Belt, approval should neither be given, except in very special circumstances, for the construction of new buildings, nor for purposes other than agriculture, sport, cemeteries, and institutions standing in extensive grounds, or other uses appropriate to a rural area. The development of the number of proposed dwellings within the Green Belt cannot be considered 'special circumstances' and for these reasons the plan is	No	The Council considers that its approach represents an appropriate balance between the competing drivers of planning for growth, and protecting the Green Belt. The “special circumstances” referred to will remain in place for areas remaining in the Green Belt, in accordance with national policy. The Council believes that it has

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		unacceptable.		sufficient robust evidence to indicate that the plan's approach to development within the Green Belt in the longer term is sound.
Principles / drivers of Green Belt review / release - <i>Objection</i>	B5.22 b)	The proposals are heavily weighted to presume there is a need to utilise Green Belt land yet there is very little evidence given as to how the figure for the number of dwellings to be built on existing land has been arrived at.	No	The Council has published and regularly updated a Strategic Housing Land Availability Assessment, which provides the evidence regarding capacity for the existing urban area to accommodate new dwellings.
Principles / drivers of Green Belt review / release - <i>Objection</i>	B5.22 c)	Disagreement is made with the approach of expansion into Green Belt areas, as this as a short sighted, easy solution instead of concentrating on the urban infrastructure and local sites available for development.	No	Through the Core Strategy, the Council is seeking to prioritise development in Knowsley's urban areas, particularly within identified Principal Regeneration Areas. However, the available evidence indicates that pursuing this approach would not allow the Council to plan to meet identified development requirements, for both residential and employment development, in the longer term (the Council is obliged to plan for at least 15 years). Hence, it is considered that the approach taken is sound.
Principles / drivers of Green Belt review /	B5.22 d)	Further encroachment on the Borough's Green Belt areas should be resisted wherever possible. There would be much more support offered to new developments using brownfield and former	No	Noted. The Council's approach has sought to prioritise new development within urban areas, including previously developed land. In

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release - <i>Objection</i>		residential / industrial land.		accordance with national policy, it is agreed that Green Belt release should be resisted wherever possible. However, the exceptional circumstances of an identified shortage of land within the urban area to meet long term development requirements means that that Green Belt development is needed. This approach is informed by a robust and credible evidence base.
Principles / drivers of Green Belt review / release - <i>Objection</i>	B5.22 e)	The Council should consider “brownfield” sites in preference to the use of existing “greenfield” land. Greenfield land should not be used for housing development, especially as it contains a substantial part of the local flood plain.	No	The Council’s approach through the spatial strategy is to prioritise the use of previously developed land (brownfield land – see Policy CS 2). This prioritisation is also reflected in the identification of Principal Regeneration Areas, which represent major opportunities for re-use of such previously developed land. In addition, the delay the release of Green Belt land (predominantly though not exclusively “Greenfield” land) until after the opportunities for development in the urban area have become limited also reflects the priority to re-use previously developed land. Local flooding issues have been considered

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				as part of the Council’s evidence base, and are also accounted for in Policy CS 24.
Principles / drivers of Green Belt review / release - <i>Objection</i>	B5.22 f)	The careful planning, redevelopment and regeneration of existing deprived areas or brown field sites can ensure that existing amenity is better utilised in these areas to create new, vibrant sustainable communities. More efficient use of these areas (as opposed to new green field development) ensures the continued protection of our greatest amenity, the Green Belt. Areas such as these must always be released for development in advance of Green Belt land coming forward.	No	This is reflected in the Council’s approach to prioritising previously developed land, as discussed above. The Council recognises that Green Belt should only be developed when the availability of land within the urban area has become extremely limited. This approach is secured through the phasing mechanisms of Policy CS5.
Principles / drivers of Green Belt review / release - <i>Objection</i>	B5.22 g)	The original Everton academy planning application should be looked at in the context of safeguarding the existing Green Belt.	No	Previously consented developments cannot be reviewed through the Core Strategy.
Principles / drivers of Green Belt review / release - <i>Objection</i>	B5.22 h)	In section 5.36 Option 5B considered meeting the need for development through a greater number of small scale Green Belt amendments. This option was dismissed as “insufficient appropriately sized and located areas for small scale detailed Green Belt amendment have been identified to meet the shortfall in development requirements”. However the Council have failed to identify the type of sites that they considered or the methodology used to	No	The Council’s Green Belt Study identifies a range of Green Belt locations which may be suitable for development, including those which were dismissed for reasons such as their limited scale.

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		form this opinion.		
Principles / drivers of Green Belt review / release - <i>Objection</i>	B5.22 i)	Green Belt policy is a remarkably powerful policy, in that it reverses the reasoning process followed in determining applications by placing the onus on applicants to demonstrate why an application should be allowed rather than the planning authority demonstrating why it should be refused. A policy of such power should not be treated lightly and should not be used for anything other than that for which it is intended. Statements in the policy should only be applied according to what they say and not according to what the planning authority wishes.	No	The Council recognises that Green Belt policy is of particular significance and should be treated carefully. This is reflected in the Council's approach to planning for potential development within the Green Belt, which is based on robust and credible evidence, and has been subject to assessments and consultation.
Impacts on neighbouring authorities / sub-region / infrastructure	B5.23 a)	The Merseyside Green Belt Study (Final Report) published in January 2005, utilised the findings of urban capacity studies for Knowsley and Merseyside as a whole and concluded that there was no need to review the Green Belt boundary in Merseyside.	No	The Council notes the findings of this study. However, the Council through the Core Strategy has to plan for the long term (up to 2028), and through its evidence base has identified significant constraints to land availability to meet long term development needs. This has driven the need to consider local changes to the Green Belt boundary to accommodate longer term development.
Impacts on neighbouring authorities / sub-region / infrastructure	B5.23 b)	Why has Green Belt land been identified as suitable for development without a full review of the Merseyside Green Belt boundaries?	No	The Council notes that a full review of the Merseyside Green Belt has not yet been undertaken. However the Council through the Core Strategy has to plan for the long term (up to 2028), and

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				through its evidence base has identified significant constraints to land availability to meet long term development needs within Knowsley. This has driven the need to consider local changes to the Green Belt boundary to accommodate longer term development. This local approach accounts for the land supply issues within Knowsley, negating the need for a Merseyside-wide review of the Green Belt in the short term. The Council would support a Merseyside-wide review in due course.
Impacts on neighbouring authorities / sub-region / infrastructure	B5.23 c)	While the Preferred Options Report does not highlight any issues which would have a direct impact on Wirral, the potential release of land within the Merseyside Green Belt following an isolated partial review could however have a negative impact on the implementation of the wider strategy of urban regeneration across Merseyside as a whole which has, to date, been a key element of the agreed wider spatial strategy	No	Noted. The Council recognises the strategic importance of the Merseyside Green Belt as a whole, across the sub-region and the strategic role it plays within Knowsley. The decision to locally review Green Belt boundaries was taken due to the lack of alternative strategies available to meet the development needs arising during the plan period, for both housing and employment growth. As noted, it is not considered that this will detrimentally affect any other authorities within the sub-region, who have developed their

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				own strategies for meeting development requirements, based on their own local circumstances.
Impacts on neighbouring authorities / sub-region / infrastructure	B5.23 d)	There is satisfaction that the Preferred Options Report does not expand any settlements in Knowsley into Green Belt on the Lancashire boundary.	No	Noted.
Impacts on neighbouring authorities / sub-region / infrastructure	B5.23 e)	CS5 should consider the development requirements and potential need for Green Belt review around Widnes (in Halton), and in particular the potential for any such need to be met as a westward urban extension into Knowsley. It should be noted that this is not an option that has been formally considered / endorsed by Halton. This notwithstanding, it would be premature for Knowsley to preclude this option in the Core Strategy without proper consideration by the two authorities.	No	The Council drafted the Core Strategy with regard to the emerging strategies of neighbouring authorities. Indeed, in developing its approach to meeting longer term development requirements, the Council worked with neighbouring authorities on joint evidence base (with Sefton and West Lancashire on the Green Belt Study – authorities with known established issues regarding land supply), and consulted all neighbouring authorities on the development of its approach through both formal (c.f. Issues and Options Paper) and informal mechanisms (c.f. District Planning Officers, sub-regional workshops). In drafting the Preferred Options Report, the Council did not anticipate that a Green Belt review for the Halton area

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				<p>was either planned in the short term, and in particular was not aware of Halton’s aspiration to consider any option to extend the urban areas of Widnes into Knowsley’s administrative area. It is not within the power of the Council to consider the need or otherwise for Green Belt review in a neighbouring authority area – this is clearly the jurisdiction of Halton Borough Council. Our own approach indicates that land within Knowsley around Cronton (at the border with Halton) is not suitable for a potential extension of the established urban area as it would conflict with the principles of national Green Belt policy (ensuring settlements do not merge into one another). The Green Belt Study concluded that land to the west of Widnes, within Knowsley’s administrative boundary had potential to accommodate development without undermining the principles of Green Belt policy. However, these areas were deemed less preferable, and ultimately not highlighted in the Preferred Option Report, due to their isolated location in</p>

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				<p>relation to Knowsley’s existing urban areas and resultant issues relating to the delivery of sustainable development in the longer term.</p> <p>The Council wishes to continue working alongside neighbouring authorities in developing approaches to longer term planning for the sub-region.</p>
Impacts on neighbouring authorities / sub-region / infrastructure	B5.23 f)	Although the justification regarding CS5 refers to a shared approach with Sefton and to some extent West Lancashire, there is no reference to other neighbouring authorities which is systematic of the purely ‘locally arising needs’ approach to the Green Belt Study.	No	<p>The Green Belt study was undertaken jointly with Sefton Council and West Lancashire Council adopted a similar methodology. The three authorities worked jointly in a number of areas, including the appraisal of cross-boundary Green Belt where appropriate. As Knowsley’s Green Belt Study has been undertaken to support the Council’s planning strategy, it does not seek to assess the needs of neighbouring authorities.</p> <p>Initial formal discussions at the sub-regional level, involving all Merseyside authorities, resulted in only three authorities (Sefton, Knowsley and West Lancashire) agreeing to</p>

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				<p>undertake a Green Belt review at that time as they had longer term land supply issues which needed to be addressed in order to ensure robust and “sound” planning strategies were delivered for each authority.</p> <p>The Council’s Housing and Employment Needs “Overview” Study examined sub-regional land supply, housing markets and development needs. This Study has informed the Core Strategy as part of the wider evidence base.</p>
Impacts on neighbouring authorities / sub-region / infrastructure	B5.23 g)	As identified in the Overview Study, there is some scope for Knowsley's housing needs to be accommodated within Liverpool, but this is not evaluated within the assessment of housing supply. Given too that Liverpool's own strategy is aimed at reducing net outflows of population and households to adjoining districts and elsewhere - within which net outflows to Knowsley have historically comprised the larger part - a closer evaluation of the impacts of changes to those flows is warranted before a commitment is made to Green Belt release.	No	While the Council agrees that there is a close relationship between the housing markets in parts of Knowsley and parts of the Liverpool City Council area, it supports the conclusions of the Overview Study that the ability of Liverpool to accommodate a proportion of Knowsley’s housing needs is severely limited. This is due to questions over the long term supply of dwellings within Liverpool (with a very high proportion within the “Liverpool Waters” development) and also the extent to which Knowsley’s housing

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				needs (e.g. for family housing) could be met by the types of housing expected to be delivered in Liverpool (including a high proportion of apartments). The Council considers that its levels of housing growth, and its strategy for delivering such housing, reflects the available evidence base, and represents the best approach given the available alternatives. However, the Council would welcome the opportunity to continue to work with its neighbouring authorities (including Liverpool) on this and other matters.
Impacts on neighbouring authorities / sub-region / infrastructure	B5.23 h)	With respect to employment land in Knowsley, the Overview Study suggests that since the estimates of supply of and demand for this land should be treated with some caution and that the resulting figure for shortfall of land for employment on existing allocations in Knowsley might be an over-estimate.	No	The Council is satisfied that in its Core Strategy, it has used the most appropriate, evidence-based approach to projecting future needs for employment land. The Council has considered the merits of a wide range of projection methods, alongside a detailed consideration of the existing and potential future opportunities for economic development and regeneration in Knowsley.
Impacts on neighbouring authorities /	B5.23 i)	Potential scope for accommodating some of its land requirements in St. Helens - particularly in the longer term, when release of Green Belt land in	No	The Council has, through its evidence base and particularly through the Overview Study, explored opportunities

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sub-region / infrastructure		Knowsley might be considered - is not explored in the Preferred Options document.		for neighbouring authorities to accommodate housing needs arising in Knowsley. This option was discounted as being not feasible due to the identified supply or deliverability constraints in neighbouring authorities, and the need to meet locally arising needs within Knowsley's township areas.
Impacts on neighbouring authorities / sub-region / infrastructure	B5.23 j)	It is recognised that decisions on the suitability and final identification of some major Green Belt sites may be deferred to the later Site Allocation stage in the LDF process. It would have to be demonstrated that any potential development impacts do not adversely impact upon the strategic road network. It is realised that the latter consideration has to be fairly balanced with the needs of urban regeneration. Potential developers would be required to assess traffic impacts via transport assessments including travel plan considerations. This is necessary in the interest of maintaining an efficient and safe strategic highway network.	No	Noted. The impact of potential development within the Green Belt on highway infrastructure, including the strategic road network, has been considered as part of the selection of the broad locations which may be suitable for growth. The issue is also considered through Policies CS 5, CS 7 and CS 27 in detail. The Council agrees that maintaining an efficient and strategic highway network is a key priority for the development of the Borough.
Distribution of development	B5.24 a)	The Council's approach is too narrow and is unlikely to lead to the most sustainable patterns of development. The advice in the Draft NPPF is that the review of Green Belt boundaries should be guided by the overriding need to promote sustainable patterns of development. From the	No	The Council considers that it has adopted a balanced and appropriate approach to the provision of employment land, to support sustainable economic development in Knowsley, in the short, medium and

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		<p>perspective of employment land it is particularly important to ensure that opportunities are identified which enable the promotion of sustainable economic development (in accord with CS2). This means selecting locations that reduce the need to travel and that do not require major investment in new infrastructure, and by recognising that the portfolio of available opportunities needs to support the development needs of established and emerging sectors (in accord with CS4). More priority should be given to land which is capable of development and well served by infrastructure rather than a reliance on historic allocations.</p>		<p>longer term. Most areas of Knowsley and in particular the existing employment areas, are well served by transportation infrastructure, and are also close to large areas of potential employees. It is therefore considered that all of the areas selected for employment growth (including historic and proposed new allocations) will not significantly increase the need for, or distance of, commuting. Given the additional policy guidance in Policies CS 4 and CS 7, the Council does not consider it necessary to change its approach in the light of this issue.</p>
Distribution of development	B5.24 b)	<p>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. This is the wrong approach to making a spatial strategy which rather should establish the broad distribution of development first, and do so having regard to the location and role of the 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.</p>	No	<p>In planning for the distribution of new development within the Core Strategy plan period, the Council has sought to achieve a balanced approach between a large number of competing objectives. As set out within a range of evidence base and technical reports, a large number of issues have been considered as part of the plan-making process. Accounting for this, it is considered that the approach within the Core Strategy adopts the most appropriate balance between planning</p>

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		<p>How the level of development, primarily housing and employment accommodation, is achieved and from which sources of supply 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 overall distribution. The Council has followed an approach which is driven by <i>‘what can be built where and in what circumstances’</i>, and not sufficiently by <i>‘how economic, social and environmental objectives will be achieved’</i> or <i>‘by the needs and problems of the communities’</i>.</p>		<p>effectively for growth, and recognising the existing constraints on development within the Borough. This includes accounting for the appropriate scale of development needed within each of the Borough’s settlement areas, while seeking to ensure that wider economic, social and environmental objectives are met. This process is also supported by the findings of the Sustainability Appraisal, which support that the Council has selected the best approach given the reasonable alternatives.</p>
Distribution of development	B5.24 c)	<p>The total amount of development that the Council has decided is needed for the District has been distributed it seems, according to the capacity within the urban area, followed by the use of the capacity available in the edge of settlement locations selected on the basis of the least harm to a very narrow and simplistic interpretation of their importance to Green Belt purposes. Following a proper process, more development would be provided for at Halewood in the spatial strategy.</p>	No	<p>The Council’s approach to the distribution of development is based on a range of competing factors, as described above. The scale of development planned for in Halewood seeks to meet development needs and requirements, while recognising that the settlement area is very tightly constrained by Green Belt designations. This represents a balanced approach between social, economic and environmental objectives. The Green Belt Study demonstrates that the selection of</p>

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				locations for development in Halewood is based on a methodology which very closely reflects national Green Belt policy.
Distribution of development	B5.24 d)	The level of housing directed to Halewood reflects the agreed overall Borough provision and the current distribution of the population between the townships. The overall Borough provision should be at least what it is, and could be higher to reflect the appropriateness of provision at Halewood as noted, and the attractiveness of Halewood to the market, the growth agenda of the Draft NPPF, and the practicality of meeting the '5 year supply plus 20%' rule which is approaching.	No	<p>The Council is satisfied that it has taken an appropriate approach to overall Borough provision of new housing, reflecting needs and demands, and the realism of delivery. It does not consider that the appropriateness of new residential development in Halewood would be sufficient justification to consider increasing this overall level of planned provision.</p> <p>The Council has ensured the provisions of the NPPF relating to the 5-year land supply are met by undertaking regular updates to its SHLAA and undertaking a proactive approach to land allocations (including the Green Belt Study) which will ensure the 5-year is managed effectively over the plan period.</p>
Distribution of development	B5.24 e)	The amount of employment land provided for at Halewood is clearly inadequate. The amount provided for at Halewood in total should be at least	No	The Council's approach to planning for a balanced provision of employment land around the Borough has

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		<p>equivalent to what will be the proportion of the population resident at Halewood, whereas it will be a lot less, and this includes provision that is at best inflexible and may not be generally available. Achieving an amount at least equivalent to the distribution of housing would reflect the importance of Halewood as an employment area and lead to a more balanced supply across the Borough.</p>		<p>accounted for more than just what the “pro rata” population split would demand. In Halewood, the Council has considered for example, the existence of a major employer within the area (Jaguar Land Rover) as well as the proximity and ease of access to, as well as contiguity with, major employment areas in the south of the Liverpool City Council administrative area (i.e. around Speke Boulevard and the Airport). Accounting for this, as well as the existing geography and infrastructure of the Halewood area, the Council considers its approach to this issue is sound given the reasonable alternatives.</p>
Housing land supply and urban area capacity	B5.24 a)	<p>The Council may have taken insufficient account of the potential housing supply that lies within existing urban areas and to a lesser degree within its own housing stock. Its proposals to release Green Belt land are based on an underestimate of the capacity that potentially lies on urban land. Knowsley's SHLAA is self-evidently a cautious assessment of urban land supply and is also a partial assessment as it does not factor in potential supply arising from: windfalls, urban greenspaces, other Council landholdings, changes in allocation, changes in</p>	No	<p>The Council is satisfied that its SHLAA represents a robust assessment of the existing urban capacity for residential development.</p> <p>The SHLAAs 20% “risk assessment” has been informed by independent consultants and extensive engagement with house builders, the House Builders Federation (HBF) and Social Landlords via the Housing Market</p>

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		<p>densities of development and bringing empty homes back into use. Moreover, the supply that is identified in the SHLAA is subject to a 20% "risk assessment" discount to allow for non-implementation. There is little evidential justification for this discount and no evaluation of the factors presumed to underpin it.</p>		<p>Partnership (HMP) for Knowsley, Sefton and West Lancashire. This is in line with national SHLAA guidance. The risk assessment represents the fact that some planning applications or sites identified by the SHLAA process may not be delivered as anticipated. The risk assessment is periodically re-assessed as part of the annual update process for the SHLAA. The potential for adjusting the risk assessment was discussed at a HMP meeting in April 2012. It was made clear at this stage that the risk assessment was considered robust and suitable.</p> <p>The SHLAA makes it clear that additional sources of supply such as urban greenspaces, Council landholdings, and existing employment allocations have been assessed and additional supply has been identified where appropriate.</p> <p>The SHLAA (2012 Update) states that there is not currently enough consistent and reliable evidence to robustly justify a windfall allowance</p>

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				given the relatively short period since publication of the first SHLAA in March 2010. Work in this area is ongoing, and will be considered by future updates to the SHLAA.
Housing land supply and urban area capacity	B5.24 b)	Due to Knowsley's constrained urban area, the identification of a sufficient long term housing land supply is not possible, and as a result, the Council's SHLAA identifies that the Borough suffers from a shortfall of 2,146 dwellings over this 15 year period. This figure differs from that which is quoted within the Draft Green Belt Study (a shortfall of 2,884 dwellings), which need to be accommodated outside of the urban area. The reports should be consistent and backed up by a robust evidence base.	No	Noted. The figures relating to housing supply for future iterations of the Core Strategy will relate to the most up to date information available from the SHLAA process.
Housing land supply and urban area capacity	B5.24 c)	Support is given that planning applications for residential development within the reserved sites will only be granted when it is necessary to maintain a five year deliverable supply of housing sites in accordance with CS3. It is unlikely that the Council is able to demonstrate a deliverable five year housing land supply at present and that there is an urgent need to ensure that these reserved Green Belt sites are released from the Green Belt so that development on these sites can assist with the Strategic Objectives of the Core Strategy.	No	The Council is satisfied that its approach to release of Green Belt sites for new development is based on a robust phasing mechanism, which seeks to protect priorities for urban regeneration, whilst also seeking to maintain a flexible and varied land supply for new residential development. The Council anticipates that a five-year supply will be identifiable in the shorter term, and therefore the release of Green Belt

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				sites will only come forward once this has been diminished.
Phasing of Green Belt release, tiers and trigger mechanisms	B5.25 a)	The effectiveness of the release mechanism to determine the urban areas to be prioritised before the broad locations is undermined by the emphasis on maintaining a five-year supply for housing land. The Core Strategy acknowledges the flexibility offered by maintaining a five year supply to address emerging deficits in supply, which should such deficits occur, would put pressure on bring forward locations that were formerly in the Green Belt. Consequently, locations identified initially to meet the longer term development needs may be developed in advance of sites which would contribute to the urban regeneration focus of the Spatial Strategy and as a result the expense of the latter.	No	The Council is comfortable that its approach to phasing and release of Green Belt sites is the most appropriate given the alternatives, and given the need to protect the delivery of long-standing regeneration priorities within Knowsley. It is noted that the proposed release mechanism may result in Green Belt sites coming forward before the completion of all of the regeneration priorities identified, due to the need to maintain a flexible five year housing land supply. This is considered necessary in order that the requisite levels of growth can be planned for and delivered.
Phasing of Green Belt release, tiers and trigger mechanisms	B5.25 b)	Whilst CS5 highlights that the first priority for housing shall be the existing urban area and release of the broad locations must not undermine the urban regeneration objectives, this is offset by permitting locations proposed for housing to be granted to maintain a five year deliverable supply. In effect, the trigger mechanism is likely by default become the need for maintenance of a five year housing supply. The application of the trigger mechanism to determine the spatial pattern of	No	The Council is comfortable that its approach to the release of Green Belt sites represents a balance between the competing objectives of delivering regeneration priorities, and maintaining a five year supply of housing. The Council considers the latter a priority, in order that it can plan effectively for longer term housing delivery, rather than being subject to the likely appeal-

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		<p>development strictly only applies to the phasing of the development of the three categories of broad locations, sequenced as firstly Reserved Tier 1 locations, followed by Reserved Tier 2 locations, and post 2027 Safeguarded locations. Whereas, the relationship between the urban areas and Green Belt vis-à-vis housing development is managed only in general terms by the overall spatial development strategy and a phasing approach which seeks to 'ensure a five year supply to support the efficient use of available land and protection of urban regeneration priorities'. As regards the phasing approach, the concern is that achieving urban regeneration priorities is undermined by the need to ensure a five year supply.</p>		<p>led system which would result from the inability to demonstrate a five year supply. The Council also considers it important to provide a range of housing development opportunities across the Borough, including a range of different types of sites which would meet housing needs arising in the different parts of the Borough.</p>
Phasing of Green Belt release, tiers and trigger mechanisms	B5.25 c)	<p>It is agreed that first priority should normally be given to the development of land in the current urban area. However, the most important factor determining timing should be sustainability. In deciding the order of release, the most sustainable sites should be developed first. In certain circumstances this should be sites currently within the Green Belt. It is considered that given the scale of the employment and housing requirements of the Borough, some sites should be released from the Green Belt in the early part of the plan period. In this regard, there is a strong case that some of the</p>	No	<p>The Council is comfortable with its phasing approach, which reflects the most sustainable overall approach to the delivery of new development. The Council disagrees with the approach that locations within the Green Belt should be brought forward in advance of the five year supply trigger mechanism, as it is felt that this would undermine the focus in the early part of the plan period on capitalising on opportunities to deliver regeneration</p>

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		larger sites currently within the Green Belt should be identified by the Core Strategy as strategic sites within the meaning of PPS12 because they are so central to achievement of its strategy. Other sites should be identified as broad locations for development.		projects within the Borough. The Council does not consider that any locations within the Green Belt should be identified as strategic sites within the Core Strategy, as they are identified to meet local needs, which cumulatively will contribute towards meeting Borough-wide needs, rather than being innately critical to the delivery of the central objectives of the Core Strategy.
Phasing of Green Belt release, tiers and trigger mechanisms	B5.25 d)	The Preferred Options Report explains that "for reasons of scale and flexibility" the smaller sites have been placed in Tier 1 for the purposes of phasing. This is the wrong way in which to accord priority to release. The main factors should be the relative sustainability of the various sites, including the likely contribution to the planning objectives for the area and the impact upon the Green Belt. Larger sites are more likely to be sustainable and make a greater contribution to planning objectives than smaller sites because of their ability to incorporate sustainable features such as public transport and carbon reduction measures, and to provide social and community infrastructure. Furthermore, larger sites are likely to have much longer lead-in times and be developed over a much longer time-period.	Yes	The Council has undertaken further work to develop the phasing mechanism for the release of Green Belt locations in the Core Strategy. Changes have been made to Policy CS5, and specifically the phasing mechanism, which reflects this additional work which relates to flood risk, transport feasibility and sustainability appraisal. Furthermore, other evidence base studies such as the SHLAA, SHMA and national guidance have also informed the policy. The Council has also had regard for the provisions of the IDP in preparing

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				<p>its phasing mechanism within CS5.</p> <p>The estimated lead-in and likely delivery times for smaller and larger Green Belt locations are highlighted in the housing trajectory which accompanies the final Core Strategy.</p>
Phasing of Green Belt release, tiers and trigger mechanisms	B5.25 e)	<p>CS5 suggests that further small alterations to the Green Belt boundaries will be identified in the Site Allocations and Development Policies DPD along with the strategic sites identified in table 5.4. Support is given to this as there are a number of other sites where smaller alterations are required to create more robust, longer term boundaries.</p>	No	<p>Noted and welcomed. The Council intends to pursue this approach through a subsequent DPD.</p>
Phasing of Green Belt release, tiers and trigger mechanisms	B5.25 f)	<p>There is some ambiguity over the status of a “reserved location”. Would the policy remove the location from the Green Belt on adoption of the core strategy, or when the location meets the criteria for development (i.e. at some point after the adoption of the core strategy)? If it is the former, then should the locations actually be identified and allocated by the core strategy as strategic sites (it is argued that they are critical to the delivery of the strategy)? Similarly the core strategy refers to the reserved and safeguarded areas as broad locations. However, the supporting Green Belt study identifies specific sites.</p>	No	<p>The Council intends that the Green Belt locations identified within the Core Strategy as being suitable for future development will remain as Green Belt designations until such a time that the Council changes this designation within an updated Proposals Map. This is likely to be within a subsequent DPD. It is not anticipated that Green Belt locations will be required for new development until such a DPD is completed, as there is sufficient land within the urban area in the short term. The Green Belt study does identify</p>

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				specific site boundaries for the purposes of the study only. The Council is comfortable with its approach of identifying broad locations in the Core Strategy, as this maintains the requisite flexibility for a strategic spatial plan.
Phasing of Green Belt release, tiers and trigger mechanisms	B5.25 g)	It is considered that the clause which suggests that planning permission should only be granted for the development of reserve locations, where it is necessary to maintain a five year supply, is not appropriate. Objection is made to this. There is a clear and distinct need for housing now: it can never be accurately determined when or if development is to come forward on a site once planning permission has been granted. In the case of outline planning permissions, it can potentially take three to four years, and in some instances, even longer.	No	Noted. It is agreed that there is a clear need for housing delivery within Knowsley in the short term. The Council considers that it has met the need to identify sufficient housing development opportunities, through the maintenance of a five-year supply, as set out in the SHLAA. The SHLAA accounts for the likely delivery rates in profiling supply over 0 to 5, 6 to 10, and 11 to 15 year periods. The Council considers that its approach is the most appropriate given the alternatives.
Phasing of Green Belt release, tiers and trigger mechanisms	B5.25 h)	The assessment criteria used to establish phasing is too arbitrary, simplistic and ultimately flawed. Just because a site is comparatively smaller than another does not, in any way mean that it should have an automatic advantage over another, or necessarily that it will be easier or more flexible to develop than another. Each site is different with its own unique opportunities and constraints. Whether	Yes	The Council has undertaken further work to develop the phasing mechanism for the release of Green Belt locations in the Core Strategy. Changes have been made to Policy CS5, and specifically the phasing mechanism, which reflects this additional work which relates to flood

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		a site is small or large is largely inconsequential; what should matter more are the site’s comparative suitability, availability and developability in PPS3 terms. Therefore it is recommended that decisions taken regarding tiering and the phased release of sites for residential development should be based on such PPS3 criteria. The Green Belt Study should be revised to reflect this.		risk, transport feasibility and sustainability appraisal. Furthermore, other evidence base studies such as the SHLAA, SHMA and national guidance (which supersedes PPS3: Housing) have also informed the policy.
Phasing of Green Belt release, tiers and trigger mechanisms	B5.25 i)	There is concern that the new Green Belt boundaries will only be defined in the Site Allocations and Development Policies DPD. The adoption of these documents is likely to be some time after the adoption of the Core Strategy and this may lead to a delay in the delivery of housing within the Borough. There should be a clear trigger release within the Core Strategy, which will allow the release of these sites where a five year housing land supply cannot be demonstrated.	No	The Council anticipates that there is sufficient housing land to maintain a five-year supply until such a time that a subsequent DPD and updated Proposals Maps are adopted. In the interim period, in the event the Council falls below a 5-year supply any resultant planning application within a Green Belt “broad location” will be assessed on its merits, taking account of the provisions of CS 5 (including the 5-year trigger) and national policy including the presumption in favour of sustainable development.
Phasing of Green Belt release, tiers and trigger mechanisms	B5.25 j)	The draft NPPF reiterates the notion of ‘safeguarded land’ and presents the policy instruction that in making changes to the Green Belt in its local plan, a planning authority should ensure that changes will not need to be made at the end of	No	The Preferred Options report was drafted with consideration of PPG 5: Green Belts which also explored the need for “safeguarded land”. The Council is satisfied that it has met this

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		the plan period. The Council will have to address this issue, taking land out of the Green Belt that does not need to be kept permanently open and as the development requirements likely beyond the end of the current plan period provide the exceptional circumstances.		requirement which has been carried forward into the NPPF. The Council has built in flexibility to its approach to planning for housing and employment land across the plan period, and in particular has made additional provisions to accommodate longer term housing delivery (past the end of the plan period) through the safeguarding of a broad location of Green Belt land at Knowsley Village. The Council is satisfied that its approach and its commitment to regular monitoring and review will meet the requirements of national planning policy.
Phasing of Green Belt release, tiers and trigger mechanisms	B5.25 k)	Support is given to the need to urgently review the Green Belt in Knowsley, as well as the general distribution of reserve locations identified. However, the phasing of Tier 1 and Tier 2 sites is not sufficiently explained or justified. A more flexible and responsive approach is desirable which would allow sustainable sites to come forward which do not undermine the Spatial Vision or the Strategic Objectives.	No	The Council is comfortable with its phasing approach, which reflects the most sustainable overall approach to the delivery of new development. The Council disagrees with the approach that locations (in either Tier 1 or Tier 2) within the Green Belt should be brought forward in advance of the five year supply trigger mechanism, as it is felt that this would undermine the focus in the early part of the plan period on capitalising on opportunities to deliver

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				regeneration projects within the Borough. The Council considers that this approach is the most appropriate to meet the vision and objectives of the plan.
Phasing of Green Belt release, tiers and trigger mechanisms	B5.25 I)	<p>Objection is made to one of Green Belt locations in Halewood being categorised as a Tier Two location. CS5 states that these Tier Two locations will only be released when Tier One locations are not available. It is understood that the only reason the Tier One sites have been categorised as such, is because they are smaller and potentially will require less infrastructure works. However at this stage it is difficult to make such an assessment based purely on the indicative capacity of the sites. Some of the Tier One sites may well require major infrastructure works and therefore the reserved housing sites should not be categorised as Tier One or Tier Two as there is a real possibility that in prioritising one site or set of sites over the others the potential early deliverability of a large site could be missed. Therefore objection is made to the categorisation of sites and suggests that priority is not given to any particular housing sites. Any of the reserved locations identified should be able to be released for development when a five year housing land supply cannot be demonstrated.</p>	Yes	<p>The Council has undertaken further work to develop the phasing mechanism for the release of Green Belt locations in the Core Strategy. Changes have been made to Policy CS5, and specifically the phasing mechanism, which reflects this additional work which relates to flood risk, transport feasibility and sustainability appraisal. Furthermore, other evidence base studies such as the SHLAA, SHMA and national guidance have also informed the policy.</p> <p>The Council has also had regard for the provisions of the IDP in preparing its phasing mechanism within CS 5.</p>
Phasing of	B5.25	A flexible approach to land release must be taken to	No	The Council is comfortable with its

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Green Belt release, tiers and trigger mechanisms	m)	allow both Tier 1 and 2 sites to come forward in response to market conditions; something which is supported within the draft NPPF. Although CS5 states that permission will only be granted on these locations when it is necessary to maintain a five-year 'deliverable' supply of housing sites in accordance with Preferred Option CS3, the Council should ensure that this is in fact a flexible approach. This will enable to the Council to meet the identified housing demands of the Borough.		phasing approach, which reflects the most sustainable overall approach to the delivery of new development. The Council disagrees with the approach that locations within the Green Belt should be brought forward in advance of the five year supply trigger mechanism, as it is felt that this would undermine the focus in the early part of the plan period on capitalising on opportunities to deliver regeneration projects within the Borough. The Council considers that this is a sufficiently flexible approach to support the soundness of the Core Strategy.
Phasing of Green Belt release, tiers and trigger mechanisms	B5.25 n)	Objection is made to one of the sites near Halewood being categorised as a Tier Two location. Preferred Option CS5 states that these Tier Two locations will only be released when Tier One locations are not available. Reserved housing sites should not be categorised as Tier One or Tier Two as there is a real possibility that in prioritising one site or set of sites over the others the potential early deliverability of a large site could be missed. Reserved locations identified should be able to be released for development when a five year housing land supply cannot be demonstrated.	Yes	The Council has undertaken further work to develop the phasing mechanism for the release of Green Belt locations in the Core Strategy. Changes have been made to Policy CS5, and specifically the phasing mechanism, which reflects this additional work which relates to flood risk, transport feasibility and sustainability appraisal. Furthermore, other evidence base studies such as the SHLAA, SHMA and national guidance have also informed the

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				<p>policy.</p> <p>The Council has also had regard for the provisions of the IDP in preparing its phasing mechanism within CS 5.</p> <p>The lead-in and likely delivery times for smaller and larger Green Belt locations are highlighted in the housing trajectory which accompanies the Core Strategy.</p>
Phasing of Green Belt release, tiers and trigger mechanisms	B5.25 o)	The assessment criteria used to establish phasing is too arbitrary, simplistic and ultimately flawed. All land to the South of Whiston should be entirely reclassified as a Tier 1 reserved location for residential development, i.e. first phase release.	Yes	<p>The Council has undertaken further work to develop the phasing mechanism for the release of Green Belt locations in the Core Strategy. Changes have been made to Policy CS5, and specifically the phasing mechanism, which reflects this additional work which relates to flood risk, transport feasibility and sustainability appraisal. Furthermore, other evidence base studies such as the SHLAA, SHMA and national guidance have also informed the policy.</p> <p>The Council has also had regard for the provisions of the IDP in preparing</p>

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Impacts on urban regeneration	B5.26 a)	Knowsley would be facilitating and kick starting such regeneration by identifying some early releases of Green Belt land.	No	its phasing mechanism within CS 5. The Council believes that its approach to phasing of release of Green Belt locations for development represents the best option for facilitating regeneration and safeguarding development priorities within the urban area. Releasing Green Belt in advance of the proposed phasing mechanism could undermine such regeneration by attracting development away from the urban area, to the potentially more profitable Green Belt areas.
Impacts on urban regeneration	B5.26 b)	The need to encourage urban renewal in Kirkby and other parts of the district is understood, but there needs to be a parallel, although smaller scale, promotion of other sites, such as Bank Lane, Kirkby, which can bring forward the type of balanced housing market which the Spatial Vision sets out. As the Core Strategy presently stands, there is a danger that highly sustainable and well located sites will be deferred and delayed by the phasing mechanism. If the desired balanced housing market is to be achieved, it will be necessary to bring forward some of the Reserved Tier One locations as soon as possible, both to deliver the desired mix of housing and to raise the profile of Knowsley as a desirable destination for	No	Noted. The Council is comfortable that its approach to phasing will protect urban regeneration priorities most effectively. The positive impact of delivery of sustainable development within Green Belt locations should come after opportunities for regeneration in the urban area are limited to a five year supply.

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		existing and new households.		
Impacts on urban regeneration	B5.26 c)	The phasing indicated, including an immediate policy presumption for the release of "reserve" locations in circumstances where a five year supply of deliverable sites cannot be demonstrated, will almost inevitably lead to pressure for the early release of Green Belt sites. National planning policy (PPS3 and NPPF) does provide a presumption in favour of housing proposals where a five year supply of deliverable sites does not exist. However, this presumption is caveated – the release of land must also accord with the spatial strategy and should not undermine wider policy objectives e.g. urban regeneration. This is a worrying prospect as it will impact on the ability of landowners to promote the redevelopment of previously developed sites in South Prescott. In respect of Prescott it is vital that priority is given to the use of Green Belt as a strategic policy tool, in order to promote and encourage urban regeneration.	Yes	<p>The Council is satisfied that the existing wording of Policy CS5 takes adequate account of the need to prioritise urban regeneration and the development of sites within the existing urban area.</p> <p>The Core Strategy outlines the Borough’s Principal Regeneration Areas in CS1. Further guidance and policy support for regeneration within South Prescott is provided by CS13.</p> <p>Additional wording has been added to the policy to make it clear that Green Belt release should not undermine the delivery of the PRAs, and other areas of regeneration need within the Borough and the wider sub-region.</p>
Impacts on urban regeneration	B5.26 d)	It is considered that that Knowsley's proposed commitment to a degree of Green Belt release may be premature. Before endorsement could be given an approach which plans for Green Belt release for employment, and especially for housing use, during the latter years of the Knowsley Core Strategy period it would need to be demonstrated that all	No	The Council is satisfied that its approach to planning for longer term development needs is both necessary and appropriate, and is supported by a robust and credible evidence base. Evidence demonstrates that the Council has sought to prioritise

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		<p>efforts to achieve the development of land within existing urban areas have been made, and that Green Belt release is genuinely a last resort, thereby representing the exceptional circumstances required for Green Belt release under national planning guidance. This to be particularly important given the close functional and physical linkages between Liverpool City Council and Knowsley areas, as is well demonstrated by travel to work patterns and recent flows of households, and the important role the Merseyside Green Belt plays in supporting the wider sub-regional strategy of directing investment and development to the conurbation's inner areas, where there is a substantial resource of vacant brownfield land and buildings and where the essential infrastructure in support of development is already in place.</p>		<p>development of land within the urban area, and where appropriate has sought to maximise the level of development which could be accommodated within existing settlements. It has also considered (through the Overview Study) the extent to which new development could realistically be accommodated within neighbouring districts, whilst continuing to meet both residential and employment needs arising within Knowsley. The Council recognises the important role performed by the Merseyside Green Belt, and considers that its proposals would not undermine its strategic function. In addition, the Core Strategy seeks to prioritise urban regeneration in the shorter term, only turning to Green Belt release when the supply of urban land dips to below a five-year level.</p>
Impacts on the green and rural environment and flood risk	B5.27 a)	<p>A number of locations which are highlighted for Green Belt release pre 2027, and post 2027, contain sites and areas which are currently important for biodiversity and the environment, as well areas that have the potential to enhance and reconnect biodiversity in the future. Some of these</p>	No	<p>The Council believes that environmental and biodiversity objectives can be met alongside planning for growth; this is central to the approach taken within the Core Strategy. Firstly, key biodiversity</p>

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		<p>locations also have the potential for increasing community access to green spaces. This seems to be at odds with other priorities and preferred options set out within the report. For example, the planned release of Green Belt south of the M62 around Cronton Colliery, post 2027, seems to contradict with enhancing the public realm and green infrastructure between Whiston and Cronton. However, these two priorities can be taken forward together with good planning and design. Therefore it is expected that the current biodiversity assets, the biodiversity potential and the potential green infrastructure improvements, are taken into account when all Green Belt release sites are being allocated.</p>		<p>assets have been protected through the approach to the selection of appropriate locations for growth, and will continue to be protected through the site allocations process. In addition, the Council agrees that competing objectives can be resolved on a site-by-site basis through design solutions and the application of protective planning policies (e.g. Policies CS 8, CS 19, and CS 21).</p>
Impacts on the green and rural environment and flood risk	B5.27 b)	<p>The global commodity markets have seen massive inflation in recent months, and to take more farming land can only cause problems in the future. This approach (to Green Belt release) is short-sighted and lacks common sense. A stringent policy avoiding any development on Green Belt land should be followed especially when the land is in farming use.</p>	No	<p>In developing its approach to Green Belt release, the Council has sought to balance competing objectives around the need to plan for growth, but also protect key economic and environmental assets, which can take the form of agricultural land. For this and other reasons, the Council has adopted an evidence-based approach, which informs its position regarding the release of Green Belt locations. The option of avoiding all development on Green Belt would constrain the</p>

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				Council's ability to plan to meet long term development needs, and therefore has been discounted.
Impacts on the green and rural environment and flood risk	B5.27 c)	There is little enough farm land left without the Council pandering to developers and allowing the building on Green Belt which forms a welcome breathing space for Knowsley residents and should be protected.	No	The Council recognises the multiple roles of Green Belt areas within the Borough, including their economic, agricultural, recreational and open space roles. The vast majority of Green Belt within Knowsley will continue to perform these functions. However, as explained, in order to meet longer term development needs, the option of releasing Green Belt land has been chosen, and backed up by robust evidence.
Impacts on the green and rural environment and flood risk	B5.27 d)	How does Knowsley's LDF fit in with the work being undertaken by Transition Liverpool, and their 'Feed Liverpool' campaign? One of their aims is to raise awareness about issues like the need to keep farm land as farm land, as well as serve as a way of connecting people up who are interested in supporting existing urban farming initiatives and developing new ones.	No	The Council understands the priorities associated with this and other campaigns to promote local food production. However the Council is seeking to balance a range of competing priorities through its planning approaches, and has an obligation to plan to meet development needs throughout the plan period. Quality of agricultural land has been considered through the Council's evidence base including the Green Belt Study. The use of land of allotments is

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				also considered as part of Policy CS 8 and Policy CS 21.
Impacts on the green and rural environment and flood risk	B5.27 e)	Building on Green Belt will not tackle climate change and will have the opposite effect. This is not considered in sufficient detail.	No	The Council has considered a range of evidence and guidance in relation to planning effectively to limit actions which would accelerate climate change, as well as manage its impacts. It is recognised that the development of Green Belt locations could have a less positive impact on these objectives, than preserving the land in its current use. However, the Council has to manage competing priorities around social, economic and environmental objectives. This had led to the approach of planning for growth; however policies have been introduced to ensure that new development is undertaken in the most sustainable manner, including measures around design, building sustainability, green infrastructure and transportation, which should limit the negative impacts of development on climate change, as well as help to effectively manage its impacts locally.
Impacts on the green	B5.27 f)	Objection is given to the methodology used to assess Green Belt parcels in relation to the	Yes	The Council has undertaken further work to develop the phasing

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and rural environment and flood risk		<p>potential for flood risk. Land within Flood Zone 2 is being identified for development over many more sites within Flood Zone 1, and there is no evidence of a sequential approach (required by PPS25) having been taken. It is noted that the development capacity of the identified 'reserve' and 'safeguarded' sites is based on the total area of the site outside of Zone 3. What has not been considered is whether the resulting pattern of development created should only include the area within Flood Zone 1 and 2 being developed and whether or not this would create a robust, long-term Green Belt boundary or whether the proposed development is likely to increase the likelihood of flooding elsewhere. Due to the proximity of the development area to Flood Zone 3, and given the sites are all previously undeveloped, this will have an impact on the capacity of the site to absorb water and lead to greater volume of surface run-off and potentially exacerbate flooding on site or in the vicinity. It is also important to note that the Draft Knowsley and Sefton Green Belt Study a Strategic Flood Risk Assessment (SFRA) (level 2) had not yet been undertaken and none of the individual sites have been tested. Therefore, it is considered that the identified 'reserve' and 'safeguarded' sites within Flood Zones 2 and 3 should be withdrawn from the sites proposed to be removed from the Green Belt</p>		<p>mechanism for the release of Green Belt locations in the Core Strategy. Changes have been made to Policy CS5, and specifically the phasing mechanism, which reflects this additional work which relates to flood risk, transport feasibility and sustainability appraisal.</p> <p>The Council has now undertaken a Strategic Flood Risk Assessment (SFRA) (Level 2) in dialogue with the Environment Agency. The SFRA has allowed the application of Sequential and Exception tests to be undertaken in line with national requirements. The results of the SFRA have informed the Council's revised approach to the phasing of "reserved" and "safeguarded" Green Belt locations.</p>

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		under Preferred Core Strategy CS5 due to the flawed assessment methodology used within the Draft Knowsley and Sefton Green Belt Study.		
Impacts on recreation and sports facilities	B5.28 a)	By virtue of its location adjoining urban areas and comprising of essentially open land, the Green Belt makes an ideal location for outdoor sports facilities and can accommodate a wide range of sports close to major centres of population. PPG2 recognises outdoor sport as an appropriate land use in the Green Belt. Therefore it is recommended that criteria to release land from the Green Belt should take account of current and potential use for sport and recreation. Whilst it is understood that the Core Strategy would only remove the Green Belt designation of the identified locations, the text makes clear that the locations are suitable for, and indeed required for, development when specified circumstances exist.	Yes	<p>The presence of existing sporting facilities within the Green Belt has been recognised by the Green Belt Study. When identifying the development capacity of the Green Belt “broad locations” regard has been given to the Council’s Public Open Space and Outdoor Sports assessments, where either of these studies highlight a need to retain sporting facilities they have been excluded from the assumed developable area and will be retained. This process is documented within the Green Belt Study and Green Belt Technical Report.</p> <p>Core Strategy policies related to the protection of Public Open Space and Outdoor Sporting facilities will apply when assessing future planning applications within Green Belt “broad locations”.</p> <p>The Council is satisfied that national</p>

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				Green Belt policy which replaces PPG 2 provides sufficient protection for sporting uses within the Green Belt in areas affected by the release of the identified broad locations.
Impacts on recreation and sports facilities	B5.28 b)	It is recommended that the text of the Core Strategy makes clear that in terms of sporting uses, prior to any future development the sites will need to be demonstrated as being surplus to requirement or that equivalent replacement facilities would be needed. In the absence of evidence that the locations are surplus to need, then there has to be a question over the ability of the Core Strategy to deliver, as whilst there might be enough land for employment and housing through Green Belt release, the development of such sites might require equivalent areas of land to be identified for replacement sports facilities.	Yes	<p>The presence of existing sporting facilities within the Green Belt has been recognised by the Green Belt Study. When identifying the development capacity of the Green Belt “broad locations” regard has been given to the Council’s Public Open Space and Outdoor Sports assessments, where either of these studies highlight a need to retain sporting facilities they have been excluded from the assumed developable area. This process is documented within the Green Belt Technical Report.</p> <p>Core Strategy policies related to the protection of Public Open Space and Outdoor Sporting facilities will apply when assessing future planning applications within Green Belt “broad locations”.</p>

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				The Council is satisfied that national Green Belt policy which replaces PPG 2 provides sufficient protection for sporting uses within the Green Belt in areas affected by the release of the identified broad locations.
Table 5.4 – broad locations	B5.29 a)	CS5 states that any development within one of the locations identified within Table 5.4 must be sustainable and be carried out in accordance with agreed master plans, development briefs and other development assessment tools as required to accord with CS2. However, further detail is not given as to the timescale involved in creating such documents, or who they will be created by. Such tools should be more flexible in nature to ensure that any development provides housing required by the local area, whilst remaining feasible and viable.	No	<p>The Council is satisfied that the reference to “master plans, development briefs and SPDs” provides sufficient flexibility for the delivery of sustainable developments within the Green Belt “broad locations”. Flexibility on this matter is essential given the differing scale and nature of the Green Belt locations and the timescales the Core Strategy is catering for.</p> <p>The Council will be able to identify a clearer timetable and add clarity to this matter once the Core Strategy has been adopted.</p> <p>The timescales for the production of SPDs / development briefs is likely to be publicised on the Council’s website as appropriate.</p>
Table 5.4 –	B5.29 b)	Objection is made to any housing being built on	No	Noted. The Council recognises that for

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broad locations		Whiston or Prescott's Green Belt land and the scaling back of Green Belt land in the same areas. Some areas identified are areas such as Whitakers in Prescott and the area surrounding Lickers Lane in Whiston. Building on this land will infuriate residents in the area and more importantly will impact on the area's beautiful appearance.		residents neighbouring the Green Belt locations identified for development, plans are likely to be controversial. The natural and aesthetic value of these locations has been considered through the Council's evidence base. The application of other Core Strategy policies will mean that negative impacts on neighbours are minimised as far as possible.
Table 5.4 – broad locations	B5.29 c)	Some of the sites identified for removal from the Green Belt are in current use (or were last used for) sport. For example, reserved locations 3 and 5 appear to include playing fields. Objection would be made to proposals to develop such sites unless they had been demonstrated as being surplus to provision (taking into account current and future need), or genuine replacement facilities of equivalent quantity and quality are provided in a suitable location.	Yes	The presence of existing sporting facilities within the Green Belt has been recognised by the Green Belt Study. When identifying the development capacity of the Green Belt "broad locations" regard has been given to the Council's Public Open Space and Outdoor Sports assessments, where either of these studies highlight a need to retain sporting facilities they have been excluded from the assumed developable area. This process is documented within the Green Belt Technical Report. Core Strategy policies related to the protection of Public Open Space and

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				Outdoor Sporting facilities will apply when assessing future planning applications within Green Belt “broad locations”.
Table 5.4 – broad locations	B5.29 d)	It is wrong that a developer should be able to buy the land at Green Belt prices and then hold on to it in the hope of making a profit from change of designation. This form of speculation may be common, but it should be discouraged. There are many potential uses of the land which are consistent with Green Belt status, and the Council should make it clear that they have no intention of changing it.	No	The Council is aware of this issue, but save for the areas within its ownership, there is very little scope for the Council to influence the land acquisition process. The Council has made clear through the Core Strategy which areas of Green Belt it intends to change the use of, to meet future development needs. This is set out in Policy CS 5, with justification set out within the Council’s evidence base.
Table 5.4 – broad locations	B5.29 e)	The identification of locations is almost incomprehensible, (e.g., “Land to the South of Whiston for Housing”) and meaningless.	No	Through the Core Strategy (which is a strategic plan), the Council has deliberately identified only “broad locations” rather than specific site boundaries. This is because, in accordance with PPS12, only “strategic sites” which are critical to the delivery of the plan should be identified in such a way. The Council is also seeking to maintain flexibility, so that a subsequent DPD can properly define site allocation boundaries, with regard to the evidence base.

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Location 1: Land at Bank Lane, to the north west of Kirkby: <i>Support</i>	B5.30 a)	Knowsley would be facilitating and kick starting such regeneration by identifying some early releases and would, therefore, suggest that the Preferred Options should recommend the site at Bank Lane be released for immediate development. Furthermore, given the location of the Bank Lane site and its present derelict condition, it makes sense to bring this site forward for development as soon as possible.	No	Noted. The Council is comfortable that is approach to phasing will protect urban regeneration priorities most effectively. The positive impact of delivery of sustainable development within Green Belt locations should come after opportunities for regeneration in the urban area are limited to a five year supply
Location 1: Land at Bank Lane, to the north west of Kirkby: <i>Support</i>	B5.30 b)	The proposed housing development site at Bank Lane, Kirkby, would have only a very limited impact on Sefton residents.	No	Noted and welcomed.
Location 1: Land at Bank Lane, to the north west of Kirkby: <i>Support</i>	B5.30 c)	The identification of parcel land at Bank Lane, Kirkby as a location reserved for urban extension is welcomed. This site is, however, developable well in advance of the pre 2027 timescales suggested.	No	Noted. The Council is comfortable that is approach to phasing will protect urban regeneration priorities most effectively. The positive impact of delivery of sustainable development within Green Belt locations should come after opportunities for regeneration in the urban area are limited to a five year supply
Location 1: Land at Bank Lane, to the north west of	B5.30 d)	Bringing forward this site for immediate development, to complement the regeneration of the adjacent Tower Hill area, will deliver the desired mix of housing in a highly prominent "Gateway"	No	Noted. The Council is comfortable that is approach to phasing will protect urban regeneration priorities most effectively. The positive impact of

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Kirkby: <i>Support</i>		location into Knowsley. Such a development would not prejudice the urban regeneration needed in other parts of the district. Moreover, higher quality residential development at Bank Lane would help stimulate other regeneration opportunities throughout the Borough by attracting specialist national residential developers to Knowsley. The Core Strategy should be amended to allow a trigger mechanism to support the site's release for immediate development in advance of the adoption of the Allocations DPD.		delivery of sustainable development within Green Belt locations should come after opportunities for regeneration in the urban area are limited to a five year supply.
Location 1: Land at Bank Lane, to the north west of Kirkby: <i>Objection</i>	B5.31 a)	What is attractive about the residential area near this site is the nearby Green Belt. There are few open field spaces as it is and it would be beneficial to see the space developed into a park area, or woodland area, which is something the area does not have.	No	The value to the local area provided by proximity to areas of Green Belt is recognised by the Council. However, in order to meet development needs, the Council has identified that this area should be developed for residential purposes in the longer term. Through the Green Belt study methodology, it has been determined that the development of the area at Bank Lane can be achieved without detrimental impact to the established borough parks and designated woodlands.
Location 1: Land at Bank Lane, to the north west of	B5.31 b)	The development of this site would devalue neighbouring properties. There seems to be a lot of houses 'to let' and 'up for sale' so it is not very convincing that there is a demand in the area for	No	Concerns regarding the potential impact of development on neighbouring house prices are recognised by the Council. However,

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Kirkby: <i>Objection</i>		additional new housing.		unfortunately, the Council has had to balance this with delivering wider objectives for social and economic growth and sustainability. The Council notes through its evidence base that some areas of Knowsley are subject to low housing market demand currently (2012). However the Council must plan for the longer term, including for situations in which the housing market recovers and demand increases. In addition, the attractiveness of a new residential community may help to boost the vitality and viability of an existing neighbourhood in the longer term.
Location 1: Land at Bank Lane, to the north west of Kirkby: <i>Objection</i>	B5.31 c)	Given the scale of house building in Kirkby during the past 20 years, a proposal to develop land at Bank Lane does not fall into the category as being exceptional circumstances as required by PPG2.	No	Noted. The Council is comfortable that is approach to phasing will protect urban regeneration priorities most effectively. The positive impact of delivery of sustainable development within Green Belt locations should come after opportunities for regeneration in the urban area are limited to a five year supply. The identified shortage of land within the urban area to meet long term

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				development requirements means that that Green Belt development is needed. This approach is informed by a robust and credible evidence base. The Council recognises that Bank Lane, Kirkby is partially PDL, however in the context of neighbouring regeneration areas (Tower Hill) and an existing five-year land supply it is considered that there is not sufficient justification to allow the early release of the site.
Location 1: Land at Bank Lane, to the north west of Kirkby: <i>Objection</i>	B5.31 d)	The land has open views of the countryside with no means of access from Bank Lane and provides a break from the unrestricted built up areas at Tower Hill and Shevington Lane. The development would merge Kirkby with Sefton and therefore would be contrary to the principles of PPG2.	No	The Council does not consider that the development of the Bank Lane location for residential use will have the impact of merging the settlement of Kirkby with any settlement in the Sefton area. The strategic gap between settlements would be maintained, which helps to justify the Council approach to this site, as set out in the Council's evidence base.
Location 2: Land to the east of Knowsley Industrial Park:	B5.32 a)	The land is at an adequate distance from Knowsley Park so that its development will not impact on the historic setting of the Park	No	Noted and welcomed.

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<i>Support</i>				
Location 2: Land to the east of Knowsley Industrial Park: <i>Support</i>	B5.32 b)	Part of the land is in agricultural production, but it is farmed on a contract farming basis as a small part of a larger business. The removal of the land from that business will have no significant effect on the viability of the business.	No	Noted and welcomed.
Location 2: Land to the east of Knowsley Industrial Park: <i>Objection</i>	B5.33 a)	This description is confusing as it isn't clear where the land is situated - Kirkby or Knowsley Village. If it is the latter the land is Green Belt near to a Conservation Area. This must overcome the policies in PPG2 and the process of the Examination in Public.	No	<p>The location in question is close to the Knowsley Industrial Park area in the settlement of Kirkby.</p> <p>The Council has taken the historic character of Knowsley Village, specifically the Conservation Area, and Knowsley Hall (Historic Park and Gardens) into account when selecting Green Belt “broad locations”.</p> <p>The Council is aware of the need to meet national policy requirements when planning for development in Green Belt areas. This is explored and justified through the Council’s evidence base.</p>
Location 2: Land to the east of	B5.33 b)	Further release of Green Belt land for industrial uses around Knowsley Village will erode the character of the area.	No	The Council has taken the historic character of Knowsley Village, specifically the Conservation Area, and

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Knowsley Industrial Park: <i>Objection</i>				<p>Knowsley Hall (Historic Park and Gardens) into account when selecting Green Belt “broad locations”.</p> <p>The Council is satisfied the location is a sufficient distance from Knowsley Village and partially screened by the road network and associated tree lines to minimise any potential adverse impact on the setting of Knowsley Village.</p> <p>Furthermore, Policy CS 20 will ensure historic assets are given the appropriate degree of protection via the development management process.</p>
Location 3: Land at Knowsley Lane, to the north of Huyton: <i>Support</i>	B5.34 a)	Strong support is given to the allocation of this land within the Reserved Tier 1 Locations.	No	Noted and welcomed.
Location 3: Land at Knowsley Lane, to the	B5.34 b)	The site is bounded on the north by the motorway and this very effectively eliminates any impact on Knowsley Park that the development of the site might have.	No	Noted and welcomed.

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north of Huyton: <i>Support</i>				
Location 3: Land at Knowsley Lane, to the north of Huyton: <i>Support</i>	B5.34 c)	The land has for many years been used almost entirely for equine use and therefore the development of the land will have minimal effect on food production. A survey of land quality will be undertaken and provided to the Council.	No	Noted and welcomed. The Council looks forward to receiving the findings of this survey.
Location 3: Land at Knowsley Lane, to the north of Huyton: <i>Objection</i>	B5.35 a)	<p>Land on Knowsley Lane should remain as green fields and farm land to retain a rural feel in the area. Opposition is given to the Council’s proposal to consider this site for future development and it should be removed as a “Tier 1” location. There are clear reasons for this:</p> <ul style="list-style-type: none"> • A single family have lived at Knowsley Lane farm for over 120 years with each generation of the family continuing to farm the land. The family intention is to continue farming the area for many generations to come and there is extreme concern about the proposal to release the land for future housing or employment development. • The farm currently provides an open vista for the occupants of houses along Knowsley Lane and ensures a feeling of rural openness as well as a link to the historic 	No	<p>The Council recognises that the area in question has been in agricultural use for many years. It has not taken the decision to propose a change of use in this location lightly, as demonstrated through the plan preparation process and evidence base collected. The Council believes, through its evidence based approach, that a thorough investigation of all feasible options has been considered, and that the location at Knowsley Lane remains one of the most suitable within the Borough to help to meet long term housing and employment needs.</p> <p>The Council believes that environmental and biodiversity</p>

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		<p>nature of Knowsley Village. The replacement of this with new housing development will impact hugely on the semi-rural feel of the surrounding area and will generate further urban sprawl.</p> <ul style="list-style-type: none"> • The Council already recognises that the local area requires “more retail, community and leisure facilities”. The provision of new housing in this location will exacerbate this problem by removing community and leisure services (i.e. the existing stables) but also by putting more strain on the remaining local amenity with the influx of a large number of additional residents. • Loss of farming is a huge problem for the UK. The loss of further farmland must be a very last resort and other areas in the Borough must be re-considered. • The farm currently provides a natural buffer between the motorway and the residential area. Provision of new houses adjacent to the motorway would create a poor natural environment for occupiers of new dwellings. The Council have a duty of care to their residents and should therefore retain this natural buffer rather than build new family homes in an area where there are known amenity / pollution problems. 		<p>objectives can be met alongside planning for growth; this is central to the approach taken within the Core Strategy. Firstly, key biodiversity assets have been protected through the approach to the selection of appropriate locations for growth, and will continue to be protected through the site allocations process. In addition, the Council agrees that competing objectives can be resolved on a site-by-site basis through design solutions and the application of protective national and local planning policies (e.g. Policies CS 8, CS 19, and CS 21).</p> <p>Through its preparation of the Core Strategy and supporting documents, the Council has considered in detail matters of infrastructure provision, including accounting for existing pressure on services across the Borough. The Council has found no reason to believe that any infrastructure shortfalls could not be met through the provisions of the planning system.</p>

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				<p>The potential development of this location for residential use would need to carefully consider the amenity impacts of such development on existing residents and businesses, as well as on new residents. The Core Strategy and other Local Plan policies will provide planning policies which will seek to ensure that the new development, and existing residents, would not be negatively affected by issues like noise and air pollution. The Council also considers that detailed issues will need to be addressed through a planning application at a later stage.</p> <p>As noted above, the Council has considered through its assessments the potential impact of the loss of this area of agricultural land. Whilst this is clearly of value to those farming the land, the Council also recognises that the Borough contains a substantial amount of agricultural land which will remain in the Green Belt in the longer term. It has pressing housing and</p>

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				employment land needs to meet, if it is to prepare a robust and sound long term strategy for Knowsley.
Location 3: Land at Knowsley Lane, to the north of Huyton: <i>Objection</i>	B5.35 b)	There are questions and queries about how the location has been dealt with within the Green Belt Study methodology, including that the site helps to a) preserve the setting and special character of a historic area; b) provide opportunities for outdoor sport and recreation; c) provide countryside uses that should be protected. In addition, some of its “severely restrictive constraints” were not adequately recognised. There are also questions around the methodology for grouping together sites.	No	<p>The Council is satisfied that it has adopted the most appropriate method within its Green Belt study, to enable the identification of the most suitable locations for potential development. The study methodology has been applied fairly and transparently across all locations considered. Location specific justification for grouping of parcels was undertaken at Stage 4b of the Green Belt Study.</p> <p>In terms of Knowsley Lane specifically, the Green Belt Study and associated evidence addresses points a) – c) as follows;</p> <p>a) The proximity to the Knowsley Hall Estate (Historic Park and Garden) is noted, however the presence of a physical barrier between in the form of M57 is considered to significantly limit the potential impact of development on the special character of the historic area and its setting.</p>

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				<p>b) and c) The presence within the site of outdoor sport, recreation and leisure uses is noted and an appropriate assessment is made within the Green Belt Locations Sustainability Appraisal. It is clear that the loss of open space, woodland and sport pitches could have a negative impact; however this is capable of being mitigated through retention via exclusion from developable areas where appropriate.</p> <p>With regard to severely restricted constraints, those relating to K027 and K030 are noted in Stage 3a of the Green Belt Study and are assessed in detail within the Green Belt Locations Sustainability Appraisal. Associated justification for inclusion of the area as a broad location is presented within the Green Belt Technical Report, with suggested mitigation measures as appropriate.</p>
Location 3: Land at Knowsley	B5.35 c)	There are questions about the extent to which the Council has given enough consideration to the actual real life benefits that Knowsley Lane Farm	No	The Council recognises that Knowsley Lane Farm offers facilities which are accessible to members of the

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Lane, to the north of Huyton: <i>Objection</i>		offers to the community.		community, largely as a fee-paying leisure activity. It also recognises the amenity benefits of the farm, in particular its role in providing open vistas for those living nearby. Whilst the existing uses at Knowsley Lane are of value, the Borough contains a substantial amount of Green Belt land which will remain in the Green Belt in the longer term. It has pressing housing and employment land needs to meet, if it is to prepare a robust and sound long term strategy for Knowsley.
Location 3: Land at Knowsley Lane, to the north of Huyton: <i>Objection</i>	B5.35 d)	An alternative way of releasing some land for development whilst at the same time protecting the benefits of the Green Belt would be to divide Knowsley Lane Farm itself up into smaller parcels. If this methodology was adopted the farm and its immediate surrounding area would be retained and a small area of land adjacent to the motorway junction could then be allocated for future housing / employment use. In these circumstances the farm would continue to operate and some land would potentially be available for future development. Although this would not create a more logical boundary, it would enable some land to be released	No	Through the Core Strategy, the Council has not, and does not intend to, set out the detailed areas which would be subject to development within any of the Green Belt broad locations. The broad location is only identified on the Core Strategy Key Diagram. It is expected that subsequent Local Plan documents will provide additional detail regarding the area of land which would be suitable for new buildings and facilities, as well as the infrastructure provision to support the development,

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		in order to meet the Council’s objectives whilst still retaining an important area of open amenity land and thus maintaining the integrity of the Green Belt.		including on site open space where appropriate.
Location 4: Land at Edenhurst Avenue, to the west of Huyton: <i>Support</i>	B5.36 a)	The site exhibits development potential and would make a suitable and sustainable site for future housing land which could contribute to the portfolio of housing land required to fulfil annual housing land requirements	No	Noted and welcomed.
Location 4: Land at Edenhurst Avenue, to the west of Huyton: <i>Objection</i>	B5.37 a)	The Green Belt study states the limited capacity for housing would ‘make little impact on efforts... to re-balance the housing market’ and ‘have a negative influence on the financial viability of affordable housing’.	No	The Council recognises that the land at Edenhurst Avenue has a smaller potential residential yield than some of the other locations in Knowsley. However, the Council has used a robust methodology to select the most suitable locations, regardless of their size. The location at Edenhurst Avenue represents an important opportunity for residential development in the Southern area of Huyton, which is very limited in terms of urban land availability and the scope of alternative Green Belt locations to contribute to new residential development, in accordance with the findings of the Council’s evidence base.

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				<p>The issue of whether the site has sufficient capacity to have an impact on rebalancing the housing market and provision of affordable housing is an issue of development economics. This is considered through the Council's plan-level economic viability evidence, and can also be considered on a site-by-site basis at later stages of plan preparation and planning application stage. The Council feels that whatever the outcome of this process, this location is valuable for the delivery of new homes.</p>
<p>Location 4: Land at Edenhurst Avenue, to the west of Huyton: <i>Objection</i></p>	<p>B5.37 b)</p>	<p>When the field was owned by Lucas's it was a well used playing field/sports facility. This area has seen the gradual erosion of playing fields. Lucas's playing fields are gone; the land where Plessey's used to be is now being developed for housing purposes. The Council cannot keep developing into every available space within this part of Knowsley, e.g. disused leisure centre and school sites</p>	<p>No</p>	<p>Through the evidence base assembled to support the Core Strategy, the Council has carefully considered the provision of playing pitches and facilities for recreation across Knowsley. It is satisfied that its approach to selection of locations for future development is founded within this evidence and its overall approach seeks to maintain adequate facilities for all communities of the Borough.</p>
<p>Location 4: Land at</p>	<p>B5.37 c)</p>	<p>The land was purchased several years ago by speculative investor, for a relatively minimal amount</p>	<p>No</p>	<p>Noted. Outside of the sites in its ownership, the Council has little control</p>

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Edenhurst Avenue, to the west of Huyton: <i>Objection</i>		due to its Green Belt Status. It has been deliberately neglected, allowed to deteriorate and give access to unsociable behaviour, and opening up this parcel of land for private housing (or other purpose) would generate minimal income for the Council, but would give huge profit to the private land-owner, who has not maintained the land in any form since purchase.		over land acquisitions. The Council cannot seek to moderate profit levels through the planning process; nor cannot ensure that land in private ownership is maintained, unless it is causing a risk to the environment or to human health. The Council is focussing on sound planning arguments in developing its strategy for housing growth.
Location 4: Land at Edenhurst Avenue, to the west of Huyton: <i>Objection</i>	B5.37 d)	Overriding Green Belt governance would then allow the owner of the land to significantly profit from its onward sale to a developer for the sake of 90 dwellings. This circumvents the protection supposedly offered by Green Belt status, and also erodes its central purpose of separation by green field and completely dismisses any consideration for the land's alternative use that would actually benefit the Bowring Park community as a whole.	No	The Council's strategy in determining the broad locations within the Green Belt suitable for future development is supported by a robust and credible evidence base. The Green Belt Study explains why this location has been identified, including how its development can be justified in relation to national planning policy.
Location 4: Land at Edenhurst Avenue, to the west of Huyton: <i>Objection</i>	B5.37 e)	In the recent past plans were submitted to Knowsley Council to develop this site. The area surrounding Bowring Park Avenue was canvassed and the overwhelming opinion was against these plans. At this time residents were encouraged that the Council was against the development, there was sufficient land within Knowsley for future developments, and as the area was Green Belt, the Council would not pass the plans. Most residents in	No	Noted. Since previous decisions regarding the future of this location (based on UDP policies), the planning context has changed. The Council is in the position of needing to plan through the Core Strategy for the long term – up to 2028. In addition, newly collected evidence indicates that the Borough's position on housing land supply and

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		<p>the area have not changed their views and hence there is a failure to see why Knowsley Council has changed its stance in such a short space of time. In addition, since the amount of housing to be planned for has fallen from 10,000 to 7000, so there should be plenty of space without building on the Green Belt in this location.</p>		<p>the needs and demands for new development has changed. This led to the consideration of the suitability of the site for residential development in the longer term. This decision has not been taken without due consideration of the available evidence base, including the Green Belt study.</p>
<p>Location 4: Land at Edenhurst Avenue, to the west of Huyton: <i>Objection</i></p>	<p>B5.37 f)</p>	<p>Massive increase in residential density opposite Edenhurst Avenue is unacceptable overdevelopment of this area. Even 90 units will be a huge detrimental impact on the local environment. “Brownsite” development of Wilson Road should be used.</p>	<p>No</p>	<p>The Council has carefully considered the potential impacts of residential development in this area, in the light of the need to plan for the requisite levels of development across the plan period. In accordance with the findings of the Green Belt Study, the level of growth indicated for this area, in the Council’s view, does not represent overdevelopment. Alternatives to Green Belt development have been considered, for both housing and employment use, with the use of previously developed or brownfield land within the urban area being prioritised. The Wilson Road area (Huyton Business Park), while suitable for new and redeveloped employment uses, is not considered to be a suitable residential development area, and</p>

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				therefore is not a realistic alternative to the Location at Edenhurst Avenue.
Location 4: Land at Edenhurst Avenue, to the west of Huyton: <i>Objection</i>	B5.37 g)	More than half of this location is within Flood Zone 3 and 2. This leaves the north-eastern portion of the site as the developable area. The resulting development boundary would not create a long term defensible Green Belt boundary. The development of this site would not be able to extend the whole length of the eastern side in order to fully contain the site, and there is no existing containment feature to visually contain or terminate the site.	No	The Council has carefully considered the potential implications of flood risk within the broad location on the potential developable area. In this regard, it is considered that any resultant limitation on development following application of the sequential test will not preclude the creation of a defensible Green Belt boundary on the eastern side, with opportunities for integration with on-site public open space, landscaping and flood mitigation measures.
Location 4: Land at Edenhurst Avenue, to the west of Huyton: <i>Objection</i>	B5.37 h)	<p>Objection is made to the review of Green Belt boundary in this location for the following additional reasons:</p> <ul style="list-style-type: none"> • The site is already prone to flooding and further building structures would cause further problems for local residents. • Insurance costs are already increasing as the area is viewed as a higher risk area. • Existing access creates a natural boundary that serves to reinforce one of the key things all residents have in common and that is that houses were bought in Bowring Park, not Belle Vale. 	No	<p>The Council is satisfied it has correctly applied national Green Belt policy while undertaking the Green Belt Study, and consequently in the identification of the Green Belt broad locations.</p> <p>The Council has carefully considered the potential implications of flood risk within the broad location on the developable area and in terms of potential impact upon the surrounding area. In accordance with the findings of</p>

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		<ul style="list-style-type: none"> • There is no suitable or safe access to this parcel of land. Developers would either have to (a) access the area via Rimmer Avenue/Bowring Park Avenue or (b) bring in access from the other side of the field which falls within the remit of Liverpool City Council. (a) Would prove very problematic to local residents and (b) would be an issue because it would open the area up to being a rat run for people to access the motorway network through the roads leading off Edenhurst Avenue. • It would lead to an increase in local anti social behaviour. Opening up access to this area would only exacerbate this ongoing problem, and lower the quality of social life for the local community. • There are no school, medical or sports facilities provided by Knowsley Borough Council within the vicinity. Additional dwellings will surely place only further strain on existing services that are at near full capacity. • Current open space / rural feel will be lost, leading to a massive reduction in quality of life • The land has a wealth of beautiful trees many with preservation orders; it would be devastating to lose what has become an area of natural beauty. • There is now a wide range of flora, fauna and 		<p>the Strategic Flood Risk Assessment (Level 2), areas of the site have been identified as being at low risk of flooding and therefore capable of development without causing significant harm. The findings of the SFRA (Level 2) have been accepted by the Environment Agency. Additionally, a more detailed site-specific Flood Risk Assessment will be required for the site prior to development taking place.</p> <p>In accordance with the findings of the Transport Feasibility Study, access to the site remains feasible from a highway perspective from both Edenhurst Avenue and Sarum Road without causing capacity issues, but may require improvements to the junctions at Roby Road and Childwall Valley Road respectively. The existing segregated access arrangements for the Bowring Park and Belle Vale areas are acknowledged. The design of any scheme will therefore be expected to carefully consider, prevent and / or appropriately mitigate the potential for</p>

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		<p>wildlife, on the field. In a survey carried out over the last two years, it was found that 32 different species of birds visited the ground and surrounding gardens, including 15 less common and 4 scarcer species.</p> <ul style="list-style-type: none"> • It would lead to visual pollution of the current landscape as well as noise pollution due to huge increase in traffic and people. • It would create air pollution due to additional traffic to new houses and lorries for building work. • The housing would probably not be in keeping with the houses within the Edenhurst Avenue area. 		<p>additional traffic movements that could otherwise arise through the opening of a link between Roby Road and Childwall Valley Road.</p> <p>Issues such as neighbouring amenity, anti-social behaviour, pollution and noise, will be carefully controlled and mitigated in accordance with other policies in the Local Plan (CS 19) to avoid significant harm to those surrounding, when a proposed development is subsequently submitted as a planning application.</p> <p>The Edenhurst Avenue broad location is well served by public open space in close proximity, including Court Hey Park, Bowring Park Allotments and a nearby Golf Course.</p> <p>The Council will consider the requirement for new infrastructure, particularly medical and schools provision to meet future needs, although the overlapping catchment and available capacity of existing facilities in close proximity within</p>

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				<p>Liverpool will also require appropriate consideration.</p> <p>The design of any subsequent development will be intended to respect the character of the local area and where possible, protect trees within the site in accordance with Local Plan policies (CS 19 and CS 21).</p> <p>The Council believes that environmental and biodiversity objectives can be met alongside planning for growth; this is central to the approach taken within the Core Strategy. Firstly, key biodiversity assets have been protected through the approach to the selection of appropriate locations for growth, and will continue to be protected through the site allocations process. In addition, the Council agrees that competing objectives can be resolved on a site-by-site basis through design solutions and the application of protective planning policies (e.g. Policies CS 8, CS 19, and CS 21).</p>
Location 4:	B5.37 i)	If this development is at the planning stage and is	No	The Council is satisfied it has correctly

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Land at Edenhurst Avenue, to the west of Huyton: <i>Objection</i>		<p>likely to be approved then the following concerns are appropriate:</p> <ul style="list-style-type: none"> • Any development abutting Edenhurst Avenue should be no more than ground floor and one floor high. • The current trees along Edenhurst Avenue which currently do not have a preservation order are given one and are maintained with high density planting of bushes all maintained by the Council as a minimum 5m buffer zone before residential development starts. • Access to the site should be by lorries and residents should be on the opposite side of the field to Edenhurst Avenue to reduce congestion / pollution. • Measures should be put in place to prevent traffic coming from the motorway or Bowring Park Road to use the new development as a cut through to Childwall Valley Road. • Lastly this site is inappropriate for development due to mines that criss-cross the surrounding fields and brown site development would be far preferable if additional housing stock is needed. • Social housing should not abut Edenhurst Avenue. 		<p>applied national Green Belt policy while undertaking the Green Belt Study, and consequently in identifying the broad locations. The Council will carefully consider the appropriate scale, form and layout of any future development, together with the need for any landscaping and tree protection in accordance with Local Plan policies if an application is submitted in the future. This will include due regard to the character of the local area.</p> <p>The Council believes that environmental and biodiversity objectives can be met alongside planning for growth; this is central to the approach taken within the Core Strategy. Firstly, key biodiversity assets have been protected through the approach to the selection of appropriate locations for growth, and will continue to be protected through the site allocations process. In addition, the Council agrees that competing objectives can be resolved on a site-by-site basis through design solutions and the application of</p>

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				<p>protective planning policies (e.g. Policies CS 8, CS 19, and CS 21).</p> <p>The existing segregated access arrangements for the Bowring Park and Belle Vale areas are acknowledged. The design of any scheme will therefore be expected to carefully consider, prevent and / or appropriately mitigate the potential for additional traffic movements that could otherwise arise through the opening of a link between Roby Road and Childwall Valley Road.</p> <p>The Council’s approach within the Local Plan prioritises development on previously developed land and within the existing urban area. However land availability constraints in this regard, necessitates Green Belt release where appropriate to meet Knowsley’s plan period needs for residential and employment development up to 2028. Local Plan policy CS 5 includes an appropriate phasing mechanism that restricts the release for residential development to prevent negative</p>

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				<p>impact upon urban regeneration priorities, by ensuring that it occurs when the Council no longer has a ‘five year deliverable supply’ (plus a 5 or 20% buffer as required by national planning policy).</p> <p>Coal Authority records indicate no mine entries or mineral extraction constraints within the Edenhurst Avenue broad location. This will be confirmed by site surveys to support a planning application, should the site be allocated for development in the future.</p> <p>There are established issues regarding the affordability of housing in Knowsley, therefore, there is a need to seek to deliver, as well as a better choice of market housing, additional affordable housing solutions within the Borough. Local Plan policy CS 15 seeks a minimum of 25% affordable housing; however there are options for delivery other than social housing, such as intermediate housing which could be delivered on site.</p>
Location 4:	B5.37 j)	There is an awareness that all the proposed	No	Any proposed residential development

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Land at Edenhurst Avenue, to the west of Huyton: <i>Objection</i>		building is in the planning and process stage, however there is an expectation that further plans and actual numbers for the houses to be built and where the roads and access points would be for any road traffic, would be made available to local residents.		at this location has not yet entered the formal planning stage (i.e. when a planning application is submitted). Through the Council’s approach to phasing Green Belt release, such development would only be acceptable once the Council’s available housing land supply had reached limited levels. In the event of an application being submitted, all information would be publically available, and direct neighbours of the site would be notified of the application by letter.
Location 4: Land at Edenhurst Avenue, to the west of Huyton: <i>Objection</i>	B5.37 k)	The current situation offers a unique opportunity to positively enhance the Bowring Park and surrounding areas and develop the land in such a way that either enhances the emerging eco system developing there as a result of the land being left to fallow or in some form that incorporates this ‘wild’ feature to compliment the National Wildflower Centre at Court Hey and other recreational activities.	No	The Council acknowledges that the Edenhurst Avenue has potential for alternative uses, including as public open space. Nevertheless the Council has had to make difficult decisions in relation to the Green Belt in order to ensure the Borough’s can meet its longer term development requirements and the needs of its community. Therefore given the localised surplus of public open space relative to current standards and the suitability of the location for Green Belt release, means that the land is appropriately prioritised to meet Knowsley’s development

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				<p>needs.</p> <p>It is noted that Court Hey Park and the Wildflower Centre are in close proximity to the site, however they are physically separate and therefore the Edenhurst Avenue location would not provide a reasonable expansion or logical association of use. Nevertheless, the Council believes that environmental and biodiversity objectives can be met alongside planning for growth; this is central to the approach taken within the Core Strategy. Firstly, key biodiversity assets have been protected through the approach to the selection of appropriate locations for growth, and will continue to be protected through the site allocations process. In addition, the Council agrees that competing objectives can be resolved on a site-by-site basis through design solutions and the application of protective planning policies (e.g. Policies CS 8, CS 19, and CS 21).</p>
Location 5: Land bound	B5.39 a)	The development of this location for housing is a non-starter, as it incorporates Whitakers Nursery	No	The Council is satisfied it has correctly applied national Green Belt policy

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by the A58, north of Prescott: <i>Objection</i>		and the land up to the M57. The vista into Prescott from Liverpool along Liverpool Road and junction with Knowsley Lane provides a wonderful green landscape of the western slopes of the township of Prescott, possibly little altered over the past centuries, especially where it is contiguous to Knowsley Park. Housing here would be a monstrosity, let alone viable roads on Liverpool Road.		while undertaking the Green Belt Study. The Council considers that the A58 and its associated landscaping represents a significant barrier and demarcation to the historic area of the Knowsley Hall Estate and will significantly limit any adverse impacts from development within the location. Although the current landscape is likely to be altered from the eastward approach to Prescott, such development is unlikely to be harmful to local character, subject to appropriate scale and form, noting the upward sloping topography toward Prescott Town Centre to the east and the A58 to the north. In addition to the above, the south eastern corner of the area falls within Prescott Town Centre Conservation Area. However the land within, and immediately surrounding the Conversation Area is currently developed and unlikely to be redeveloped as it is currently in an alternative use (Whittaker’s Garden Centre), therefore additional development adjoining the built form of Knowsley Park Lane is

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				<p>unlikely to appear visually incongruous.</p> <p>In addition, the Council believes detailed design considerations can be resolved on a site-by-site basis through design solutions and the application of local planning policies (e.g. Policies CS 19, CS 20, and CS 21).</p> <p>In accordance with the findings of the Transport Feasibility Study, access to the site remains feasible from a highway perspective. Small scale highway and infrastructure works may be required to support the development, but remain achievable.</p>
Location 5: Land bound by the A58, north of Prescott: <i>Objection</i>	B5.39 b)	Opposition is made to the utilisation of land bounded by the A58 to the north of Prescott for housing (Whittaker's Nursery Site). This should be removed from Tier 1.	No	Noted. The Council is satisfied with the robust evidence used to identify the Green Belt "broad locations" within the Core Strategy.
Location 5: Land bound by the A58, north of Prescott: <i>Objection</i>	B5.39 c)	Is this area for building, or to make a road off Prescott bypass, as was discussed in 1985/86?	No.	Noted. The Council has identified "broad locations" within the Green Belt to accommodate housing and employment development in the longer term. While small scale highway and infrastructure works may be required to

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				support the development, the location has not been specifically selected to make provision for a “bypass”.
Location 6: Land at Carr Lane, to the west of Prescott: <i>Support</i>	B5.40 a)	Support is given for the inclusion of the site as the location to be released from the Green Belt to serve future development needs. However, there is a compelling case for either housing or employment in this location, which should be led by a comprehensive master planning process for the wider South Prescott area. The site should be fully considered as part of evolving master plan ideas. The site should be viewed as a priority opportunity for redevelopment in the context of CS13 and, as such, should be viewed as a Tier 1 Location.	Yes	The Council has amended the policy to state that the land may be suitable for employment or residential uses, subject to the future master planning and/or development proposals within the wider South Prescott PRA.
Location 6: Land at Carr Lane, to the west of Prescott: <i>Objection</i>	B5.41 a)	There are premises there that have not been occupied; also 65 acres are for sale. Being a household landfill, this will make an ideal forest area.	No	Noted. The Council believes that environmental and biodiversity objectives can be met alongside planning for growth; this is central to the approach taken within the Core Strategy. Firstly, key biodiversity assets have been protected through the approach to the selection of appropriate locations for growth, and will continue to be protected through the site allocations process. The Council agrees that competing objectives can be resolved on a site-

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				by-site basis through design solutions and the application of protective planning policies (e.g. Policies CS 8, CS 19, and CS 21).
Location 6: Land at Carr Lane, to the west of Prescott: <i>Objection</i>	B5.41 b)	The proposed development of this location for employment uses is incomprehensible. Does this mean that parts of Huyton Golf Club and the Prescott Recreation Sports Field are included or just the remaining factory buildings of the former BICC site? As Green Belt it should remain so without patchwork indiscriminate placements of houses and factories.	No	The Carr Lane site does not relate to either Huyton Golf Club or the sports field. The site is currently derelict and was formerly used by United Utilities.
Location 6: Land at Carr Lane, to the west of Prescott: <i>Objection</i>	B5.41 c)	Opposition is made to the development of the former BICC site as it is designated as a site for hazardous waste, with a part designated for housing.	Yes	The Council believes that appropriate decontamination / remediation measures can be agreed through the planning application process via application of development management policies.
Location 7: Land at Finch Lane / Higher Road, to the east of Halewood: <i>Support</i>	B5.42 a)	Support is given to the identification of locations to the east of Halewood for removal from the Green Belt and eventual development.	No	Noted and welcomed.
Location 7: Land at Finch Lane /	B5.42 b)	Strong support is given to the importance of reviewing the existing Green Belt boundary in order to meet longer term development needs for housing	No	Noted and welcomed.

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Higher Road, to the east of Halewood: <i>Support</i>		development at two locations to the east of Halewood. The sustainability credentials of this area would ensure that the aims and objectives of both National and Local policy are upheld whilst providing sustainable growth.		
Location 7: Land at Finch Lane / Higher Road, to the east of Halewood: <i>Objection</i>	B5.43 a)	These areas are designated as Green Belt in the most recent Unitary Development Plan, and it was stated that this would not be changed.	No	Noted. The broad locations in question are designated as Green Belt within the UDP. National policy indicates that Green Belt boundaries should hold a degree of permanence. However, the needs and requirements for new development, and the shortage of land within the urban area of Knowsley, has resulted in the need for a review of this. This is not a decision taken lightly by the Council, and is supported by a range of evidence and supporting documents.
Location 7: Land at Finch Lane / Higher Road, to the east of Halewood: <i>Objection</i>	B5.43 b)	<p>A main concern is the threat of the removal of the existing Green Belt boundary currently based on Baileys Lane, including concerns about how the Council has dealt with issues of containment and combination of different Green Belt sites.</p> <ul style="list-style-type: none"> The northern parcel of land at Greensbridge Lane is separated from the Baileys Lane / Lower Road parcel by a 40ft+ railway embankment. Any new Green Belt boundary for the two 'combined' parcels would have to have an 	No	The Council considers that the northern parcel off Greensbridge Lane would be appropriately contained by a combination of the existing railway embankment and the existing highway, with the alignment of Ditton Brook providing a physical barrier that will form the basis for a defensible Green Belt boundary. This feature is relevant when considering the parcel as

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		<p>artificial boundary feature added on the Greensbridge site to provide a solid 'clearly defined' Green Belt boundary that the Council could then defend from future development. With the rail embankment physically separating the two areas and no clear view of both together the need for combining them seems very weak.</p> <ul style="list-style-type: none"> With regards to moving the Green Belt boundary from Baileys Lane, the reasoning is flawed. Presently behind Baileys Lane there are trees and farmland running all the way across to Lower Road and Finch Lane. The only structures behind the houses and buildings on Baileys Lane are the RSPCA site situated remotely at the top end of Finch Lane / Higher Road. Hence, the site is an unspoilt piece of undeveloped Green Belt land used for agriculture. The excuse of using Finch Lane as a new, clearly defined boundary lacks substance and it would be difficult to determine where the Green Belt starts and finishes under the proposed change. The new proposed boundary would put other parcels of land under pressure; the caravan park on Lower Road would be an example. Small parcels of land between Finch Lane / Lower Road and isolated settlements like the caravan park would subsequently be picked off in future reviews. 		<p>standalone or in combination with the larger parcel to the south of the railway line. The layout, form and build line of the development is anticipated to be restricted to a distance closer to the existing settlement due to the prevalence of flood risk constraints. This has the potential to consolidate the strength of the boundary due to an associated landscaping / flood mitigation buffer to the build line. With the build line anticipated to be broadly consistent with eastern build line of the Higher Lane / Finch Lane parcel to the south.</p> <p>The Council's view is that the enclosure of the parcel at Higher Lane / Finch Lane, by the Lower Road and Finch Lane highways respectively, would clearly define the extent of the Green Belt with a defensible boundary and provide containment. In this regard, the presence of typical ribbon development remaining within the Green Belt on Lower Road would not encourage further development.</p>

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Location 7: Land at Finch Lane / Higher Road, to the east of Halewood: <i>Objection</i>	B5.43 c)	<p>Objection is made to this proposal for the following reasons:</p> <ul style="list-style-type: none"> • Plans fail to take account of the potential for flooding in the area; why has no mention been made about the risk of flooding in this area and the fact that the flood plain is the reason part of the former Bridgefield Forum site remains undeveloped? • There are major concerns regarding infrastructure needed to service such an increase in the number of dwellings in the area; and they fail to offer any alternative options. • The local infrastructure – schools, transport links, public amenities and services and shops – would not be able to cater for this level of increased demand. The Council has no control over bus services which are already poor from Halewood to key destinations such as Whiston Hospital; this would only make matters worse. 	No	<p>The concerns of local people are noted. Through the evidence base assembled to support the Core Strategy, the Council has carefully considered issues of flood risk and infrastructure provision, including transport, education, retail and other services. It is satisfied that the evidence collated concludes that any issues around flood risk prevention and infrastructure provision could be satisfactorily resolved as part of the future development of the location at East Halewood. Subsequent stages of plan preparation, and the consideration of a detailed planning application in the future, offer further opportunities to develop detailed solutions to support the development of this and other locations around the Borough.</p>
Location 7: Land at Finch Lane / Higher Road, to the east of Halewood: <i>Objection</i>	B5.43 d)	<p>The proposals make provision for an additional 1440 dwellings in the east Halewood area, despite the fact that in the Council’s own housing survey Halewood is ranked 5th out of 6 areas in Knowsley where people would want to buy property and it is stated that 100% of double income households would not be able to afford to purchase property based on current prices.</p>	No	<p>Through its evidence base, the Council recognises existing issues around housing affordability and an unbalanced housing market throughout the Borough. In planning for additional housing in this area in the longer term the Council is seeking to assist with rebalancing the housing market in</p>

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				Halewood, though the provision of market and affordable units. This recognises the dynamism of the housing market in the long term, including the need to plan for an up-turn in the housing market. It would not be sustainable to ignore housing needs in the Borough, based on evidence of its relative attractiveness for those seeking to purchase a property.
Location 7: Land at Finch Lane / Higher Road, to the east of Halewood: <i>Objection</i>	B5.43 e)	<p>It is understood that there is a need to make land available for houses, but the following questions are relevant:</p> <ul style="list-style-type: none"> • Why take land that extends the urban area? Why not take land closer to the present housing area, e.g. land off Lydiate Lane, which is not used for food production. • The area is used for food production - surely land should not be taken away from this, because of the present world food shortage? • The Rural Payments Fee that is paid to farmers for looking after the land is being reassessed - surely proposals will affect this for those farmers who now own the proposed areas? • When the A5300 Knowsley Expressway was built, KMBC made the statement that the edge of the Green Belt would not be moved towards it - surely that is what you are proposing, and you 	No	<p>Noted.</p> <p>The Council is satisfied it has correctly applied national Green Belt policy while undertaking the Green Belt Study. The parcel comprising the Woolton Wastewater Treatment Works and bounded by Lydiate Lane, Halewood) are within an essential gap between Halewood and Liverpool. Development within this area to the north of Halewood would significantly reduce this gap. These areas were therefore discounted as inappropriate for Green Belt release at Stage 2 of the Green Belt Study. This is noting that the release of this area of land would be in conflict with national Green Belt</p>

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		<p>should consider areas closer to the present urban area</p> <ul style="list-style-type: none"> Many people have moved to live in Halewood, as it is the edge of housing – the Council is now proposing to renege on its promise to those people, as per the UDP. 		<p>policy.</p> <p>In terms of specific issues relating to food production, the broad locations within the Local Plan and a number of discounted alternatives (including the land north of Halewood at Lydiate Lane) were assessed via the Green Belt Locations Sustainability Appraisal. The Sustainability Appraisal had regard to a number of sustainability objectives, including those associated agricultural land quality. The justification for inclusion of the specific areas as broad locations is presented within the Green Belt Technical Report, with suggested mitigation measures as appropriate. The Green Belt technical report drew from the findings of the SA. However, it should be noted that the Council has had to make difficult decisions in relation to the Green Belt in order to ensure the Borough’s can meet its longer term development requirements and the needs of its community.</p> <p>After changes are made to the Green</p>

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				<p>Belt a significant proportion of the Green Belt will remain and will continue to be protected by national and local policy.</p> <p>The Council can confirm that as a result of the proposed changes to the Green Belt to the east of Halewood, the boundary would move towards the A5300. However, it should be noted that a significant portion of the Green Belt will remain in place to the west of the A5300 after amendments to the Green Belt boundary are made.</p> <p>The Council appreciates that the policy being brought forward through the Core Strategy represents a change from the approach of the UDP in 2006. Due, in part, to the tightly drawn nature of Knowsley's Green Belt the 2006 UDP identified a potential need to review the Green Belt boundary for residential requirements after the end date of that plan (2016). In the context of employment development the UDP identified a more pressing need to identify land to ensure an adequate</p>

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				<p>supply in terms of site size, availability and quality.</p> <p>In order to plan proactively for future development needs and produce a sound development plan for the longer term the Council now needs to replace the UDP (2006) with a Local Plan to meet new national planning policy and legislation. Government guidance is clear that when Local Plans are being developed they should ideally plan over a 15-year plan period (i.e. up to 2028).</p>
<p>Location 8: Land to the south of Whiston (Phase 1, Windy Arbour Road and Phase 2, Lickers Lane): <i>Support</i></p>	<p>B5.44 a)</p>	<p>All of Site 8 and Site 9 should be included for release early in the plan period</p>	<p>Yes</p>	<p>The Council has carefully considered the housing supply position since the Preferred Options stage resulting from updated evidence within the Strategic Housing Land Availability Assessment (2012 Update), together with the requirements of the NPPF to incorporate an additional buffer (of between 5% of 20%) of deliverable sites. In this regard, it was considered that the initial phasing proposals were considered too onerous and inflexible to adequately support the promotion of sustainable growth and appropriate</p>

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				<p>residential development to meet Knowsley long term needs. The phasing mechanism has therefore been simplified accordingly within the Local Plan to reflect reserve locations (those required during the plan period) and safeguarded locations (those required to meet needs after 2028).</p> <p>Additionally, the Council considers there to be a need to master plan the location south of Whiston in a comprehensive and sustainable manner. This is inline the provisions of CS 5. Removing the Tier 1 & 2 phasing mechanisms for this location has the added benefit of supporting this requirement and allowing the location to be built out (phased) in the most appropriate way, subject to the findings of the master planning process, infrastructure requirements and other detailed planning considerations.</p>
Location 8: Land to the south of Whiston (Phase 1,	B5.44 b)	Land to the south of Whiston (in association with land surrounding it) can play a major and positive role in delivering the aims of the Core Strategy. The location and natural canvas surrounding the land (and certain woodland and wet features to be	Yes	<p>Noted.</p> <p>The Council has carefully considered the housing supply position since the Preferred Options stage resulting from</p>

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Windy Arbour Road and Phase 2, Lickers Lane): Support		<p>retained within it) create an exceptionally attractive setting for a new housing development. The capacity of the land for residential development will make a significant contribution to meeting the housing target. This will also help to retain and attract new investment, sustaining local employment and bringing new jobs to the area. However, the assessment criteria used to establish phasing is too arbitrary, simplistic and ultimately flawed. All land to the South of Whiston should be entirely reclassified as a Tier 1 reserved location for residential development, i.e. first phase release. The primary reasons being:</p> <ul style="list-style-type: none"> • <i>The suitability of the land, including its proximity to the main urban area and a wide range of key facilities.</i> • The existence of main suburban access roads means the site's development can be easily accessed and phased. • Fox's Bank Lane and the M62 allow a logical extension to and containment of the urban area, and will leave a very strong defensible boundary • There are no significant constraints to development in relation to flood risk, nature conservation, or conservation. • Part of the land is immediately available for development, provided this is on appropriate commercial terms. In addition, it is understood 		<p>updated evidence within the Strategic Housing Land Availability Assessment (2012 update), together with the requirements of the NPPF to incorporate an additional buffer of deliverable sites. In this regard, it was considered that the initial phasing proposals were considered too onerous and inflexible to adequately support the promotion of sustainable growth and appropriate residential development to meet Knowsley long term needs. The phasing mechanism has therefore been simplified accordingly within the Local Plan to reflect reserve locations (those required during the plan period) and safeguarded locations (those required to meet needs after 2028).</p> <p>Additionally, the Council considers there to be a need to master plan the location south of Whiston in a comprehensive and sustainable manner. This is inline the provisions of CS 5. Removing the Tier 1 & 2 phasing mechanisms for this location has the added benefit of supporting this</p>

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		<p>that surrounding third party owners are equally prepared to allow their land to be developed.</p> <ul style="list-style-type: none"> • There are no physical or legal (covenanted) restrictions to development. • The land will be extremely attractive to residential developers seeking prime residential locations within the borough. 		<p>requirement and allowing the location to be built out (phased) in the most appropriate way, subject to the findings of the master planning process, infrastructure requirements and other detailed planning considerations.</p> <p>Subsequent stages of plan preparation, and the consideration of a detailed planning application in the future, offer further opportunities to develop detailed solutions to support the sustainable development of this and other locations around the Borough.</p>
<p>Location 8: Land to the south of Whiston (Phase 1, Windy Arbour Road and Phase 2, Lickers Lane): <i>Objection</i></p>	<p>B5.45 a)</p>	<p>Why has Whiston got the largest proposed expansion into Green Belt land for the development of housing and then after 2027 bigger commercial area developments, when the areas of the old Pirelli and cables factory in Prescott have not been fully developed yet? Expansion is not the answer if you have not managed to fulfil the initial targets of developments in the current areas.</p>	<p>No</p>	<p>The Council's approach within the Core Strategy prioritises urban regeneration, through a range of policy approaches. This is supported by comprehensive evidence regarding existing land availability within the urban area, as well as evidence regarding the suitability of Green Belt locations to accommodate new development. The Council considers that its approach represents the correct balance between securing urban regeneration and delivering longer</p>

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				term development which complements this.
Location 8: Land to the south of Whiston (Phase 1, Windy Arbour Road and Phase 2, Lickers Lane): <i>Objection</i>	B5.45 b)	Over the years a large proportion of Green Belt in this area has been lost. In the 1970s and 1980s all the farm land between Lickers Lane and the Liverpool-Manchester railway line was developed for a council housing estate including a church, schools, public houses, community centre, shops and private housing. Significant Green Belt was also lost to the M62, M57, Knowsley Expressway, Tarbock Interchange, The Villages Hotel and Leisure complex and Fallows Way industrial estate. Previous plans for this location were rejected, supported by resident opposition, and Knowsley MBC informed the residents that the land would remain part of the Green Belt. The Local Development Framework would now indicate that, despite past assurances from Knowsley MBC, all of the remaining Green Belt in South Whiston, which is of the highest classification of agricultural land, is now to be considered for future development.	No	Noted.
Location 8: Land to the south of Whiston (Phase 1, Windy Arbour Road	B5.45 c)	Objection is made to the proposal for Whiston for the following reasons: <ul style="list-style-type: none"> • The quality of space within Knowsley will be reduced as building houses on Green Belt will lose the country feel of the area. Whiston is all ready over built on • Whiston's Green Belt is a small but significant 	No	The Council is satisfied it has correctly applied national Green Belt policy while undertaking the Green Belt Study. Nevertheless the Council has had to make difficult decisions in relation to the Green Belt in order to ensure the Borough's can meet its

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and Phase 2, Lickers Lane): <i>Objection</i>		<p>breathing space within Whiston's already cramped and congested township. These areas can provide valuable open space on the urban fringe with associated benefits including recreation, human health / enjoyment and biodiversity conservation.</p> <ul style="list-style-type: none"> • This breathing space provides residents with an opportunity to benefit from the last remaining area of Green Belt; family excursions, dog walkers, photographers, bird watchers and wildlife enthusiasts all utilise this Green Belt and gain invaluable pleasure from its aesthetical and ecological value • Whiston's commercial, educational and medical amenities have not the capacity to withstand more pressure from an increasing town population. • The development of a further 1450 dwellings would severely impact on overstretched Primary Education facilities which have been cut drastically in recent years together with cuts in youth services. • Residents who are registered with the local GP's surgeries have to wait up to two weeks sometimes longer to get an appointment at the moment, so an increase in population would have a considerable strain on a service that is already stretched to capacity. 		<p>longer term development requirements and the needs of its community. In this regard, it is noted that the existing character of the Land to the South of Whiston area will be altered by new development. However it is considered that the area at present is inconsistently defined by residential and industrial development which encroaches into the Green Belt in places. The potential boundary, following the M62 to the south and Fox's Bank Lane to the east would clearly define the extent of the Green Belt and provide containment. After changes are made to the Green Belt a significant proportion of the Green Belt will remain and will continue to be protected by national and local policy.</p> <p>The Council acknowledges that the Land to the South of Whiston / Halsnead Park area has potential for alternative uses, including as public open space. However the localised surplus of public open space relative to current standards and the suitability of the location for Green Belt release,</p>

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		<ul style="list-style-type: none"> • An increase in crime rates would be expected with an overstretched police force and only a part time police station now available in Prescot. • The road network in South Whiston is already stretched to capacity with no alternative routes due to the congestion at the Tarbock Roundabout, traffic lights at Whiston Village t-junction and the circuitous Fox's Bank Lane, a narrow and winding highway. Windy Arbor Road's heavy congestion received from the Tarbock Interchange is exacerbated by the continuously used emergency route of Whiston Hospital's emergency services and further congestion at Whiston Village. • Development would significantly increase the number of vehicles using the road network both during and after construction and would also increase noise and air pollution. The road infrastructure would not cope with this increase. • Increased traffic will also be a danger to local school children crossing the road to Whiston's primary schools • The access would not be very good and it would be difficult getting out of the development. • The area under construction is a haven for wildlife the movement of which is now curtailed by the urban boundaries and those of the M62 / Knowsley Expressway. Further development 		<p>means that the land is appropriately prioritised to meet Knowsley's development needs. In this regard, it is considered that the scale of the potential development within the location is likely to result in significant on-site provision to meet the needs of additional residents. Such provision is intended to be master planned accordingly.</p> <p>The Council believes that environmental and biodiversity objectives can be met alongside planning for growth; this is central to the approach taken within the Core Strategy. Firstly, key biodiversity assets have been protected through the approach to the selection of appropriate locations for growth, and will continue to be protected through the site allocations process. In addition, the Council considers that competing objectives such as community access, recreation and increases in potential disturbance can be resolved through design solutions and the application of protective</p>

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		<p>and loss of Green Belt would ultimately result in further loss of wildlife habitats, which are significant to the areas of biodiversity.</p> <ul style="list-style-type: none"> • This wildlife is enjoyed by the whole community and includes foxes, rabbits, water voles, mice, shrews, hedgehogs, woodland rats, squirrels, bats, barn owls, buzzards, cuckoos, woodpeckers, kestrels, skylarks and grey partridges, together with migrating wildfowl at Big Water as well as a huge diversity in insects and flora. The loss of these habitats is unacceptable. • The remaining woodland, which is not included in the plans, would be severely impacted on with overuse by the public. The quality of this remaining woodland would significantly decrease and the negative impact on wildlife would be significant. • This proposed expansion will affect some 'user-friendly' pathways that are already well established. • This will prevent organised walks and fishing hobbies from continuing in a quiet and peaceful natural environment. • It is a necessity for the local community to keep in touch with the countryside as they use it for recreational purposes, and it forms a "green lung" for the urban area. 		<p>planning policies (e.g. Policies CS 8, CS 19, and CS 21). Opportunities for recreational / leisure facilities within the Green Belt will continue to be encouraged, subject to proposals being consistent with national and local Green Belt policy.</p> <p>The Council has carefully considered the potential impacts of new residential development in the Whiston area, in terms of its impacts on infrastructure provision. Through its evidence base and contact with infrastructure suppliers, the Council has encountered no significant problems associated with the development of this location. It is considered that detailed matters of infrastructure provision can be considered later in the Local Plan preparation process or as part of any planning application for the development of the location. In this regard, the Council will consider the requirement for new infrastructure, particularly commercial, medical and schools provision to meet future needs. This includes potential to provide</p>

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		<ul style="list-style-type: none"> • There is potential for the gap between Whiston and Rainhill to be bridged by the new development • There are potential detrimental impacts on the peaceful and rural surrounds of both the existing cemetery and Halsnead Park. There is currently seclusion, not isolation, which all residents require in their remaining years. The area has the peace and quiet of a country village which will be destroyed with a housing estate. • There is a possibility of the unruly element using the park as a playground and a shortcut. • Residents who are overlooking the Green Belt Land, that include Foxshaw Close, Windy Arbor Close, Simons Close and Halsnead Caravan Park have paid premium rate for their properties for the outlook that they have. This aesthetic value would be lost should the plans be adopted. The building of 1400+ houses on the proposed land would severely devalue the properties worth, and may leave some people with negative equity values. • It is out of step with what residents want. This land should be protected for our grandchildren. • This would be contrary to the content of PPG2, including the guidance given about the use of land within Green Belts and defining boundaries of Green Belts. 		<p>addition facilities within, or near the location to meet the needs of additional residents and provide capacity for surrounding areas. In this regard, due to the scale of the development it is reasonable to conclude that the delivery of dwellings will be phased over a number of years, thereby allowing appropriate mitigation of capacity issues as required in the interim period.</p> <p>There is no evidence to suggest that crime rates and antisocial behaviour will increase as a consequence of new development. In addition, any subsequent proposal will be required to incorporate appropriate design methods to minimise crime in accordance with the Local Plan (e.g. Policy CS 19).</p> <p>In accordance with the findings of the Transport Feasibility Study, access to the site remains feasible from a highway perspective. Highway and infrastructure works are likely to be required to support the development,</p>

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				<p>particularly on pressure points such as Windy Arbor Road and its access to Tarbock Island / M62, however such works remain achievable as part of a master planned development.</p> <p>The proposed release of Green Belt land remains contained within the parameters of the extent of South Whiston’s existing build form to the east created by the physical barrier of Fox’s Bank Lane. This presents a strong and defensible Green Belt boundary protecting the strategic gap to Rainhill, with no impact upon the closest distance between the respective settlements.</p> <p>It is acknowledged that a number of neighbouring residents, including the caravan park, derive aesthetic benefits from their outlook onto Halsnead Park. However such benefits are not protected through law, as no rights to a view can be conferred over private property, where there is otherwise no impact resulting from development. In this regard, the Council is mindful of</p>

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				<p>existing residents' aspirations regarding the long term retention of the land in its existing form, together with concerns relating to devaluation of property values. However from a strategic perspective, there is no reason to suggest that appropriately designed new development would be harmful to the quality of life of existing residents or result in devaluation of local properties. Furthermore the design of development will be subject to detailed requirements in the context of other Local Plan policy requirements relating to sustainable development and preventing impact upon surroundings when a planning application is submitted. As a consequence, although these concerns are noted, they are not considered by the Council to be sufficient reason to resist appropriate release of Green Belt land to meet Knowsley's future development needs.</p> <p>The Council is satisfied that is has complied with the requirements of national Green Belt policy when</p>

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				undertaking Green Belt Study and formulating its planning strategy.
Location 8: Land to the south of Whiston (Phase 1, Windy Arbour Road and Phase 2, Lickers Lane): <i>Objection</i>	B5.45 d)	The Halsnead Park area should be transformed into a leisure area with the 'Old Saunders Nursery' made into visitors centre and ample parking area as well. This would not only enhance this area of outstanding beauty but also provide an area rich in educational values for schools.	No	The Council recognises the need for a range of facilities within the Borough including leisure facilities. The Core Strategy makes provision for leisure facilities within CS6 (Town Centres and Retail) and recognises the strategic value of Green Infrastructure in Policy CS8. Opportunities for recreational / leisure facilities within the Green Belt will continue to be encouraged, subject to proposals being consistent with national and local Green Belt policy. There are also a wide range of existing leisure facilities across the Borough, including access to open countryside, parks and gardens which are available to benefit local communities and visitors.
Location 9: Cronton Colliery (and land south of M62): <i>Support</i>	B5.46 a)	Welcome is given the proposal that the land south of M62 primarily for employment uses will only be developed after 2027.	No	Noted.
Location 9: Cronton	B5.46 b)	All of Site 8 and Site 9 should be included for release early in the plan period	No	Noted and welcomed.

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Colliery (and land south of M62): <i>Support</i>				
Location 9: Cronton Colliery (and land south of M62): <i>Objection</i>	B5.47 a)	The 42 hectare former Cronton Colliery site currently has planning approval in place for use by local communities as a country park. It is acknowledged that there is a need to establish a series of sites in the borough for future employment use and there are clear benefits of such uses in the immediate vicinity to Cronton Colliery on both sides of the motorway. However, the Charitable remit of the Land Trust and the purpose of the trust holding the site is for developing quality open green space for use by the community to improve health, provide an educational resource, protect and enhance the environment, develop social and community cohesion, and also generate economic activity. The Cronton Colliery and adjoining land can provide a resource in each of these 5 areas.	No	<p>The Council believes that environmental and biodiversity objectives can be met alongside planning for growth; this is central to the approach taken within the Core Strategy. Firstly, key biodiversity assets have been protected through the approach to the selection of appropriate locations for growth, and will continue to be protected through the site allocations process. In addition, the Council agrees that competing objectives can be resolved on a site-by-site basis through design solutions and the application of protective planning policies (e.g. Policies CS 8, CS 19, and CS 21).</p> <p>The Council acknowledges the Land Trust’s ownership of Cronton Colliery and the purposes for which the Trust acquired the site. It is noted that the extent of the colliery has been excluded from the assumed</p>

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				<p>developable area for the “broad location”.</p> <p>Additionally, the Council is aware of potential future discussions between the Land Trust and neighbouring land owners which may result in opportunities for cross subsidy between potential economic development sites and the development of the country park.</p> <p>The existing approach within CS5 and the Green Belt Technical Report allows flexibility should this discussion develop in the future.</p> <p>In the event the Land Trust sought to develop the country park in isolation from neighbouring development, this would be compliant with the approach and assumed development capacities within CS5.</p>
Location 8 & 9: Joint Comments in Support	B5.48 a)	Welcomes the exclusion of Locations 8 (Phase 1 and 2) and Location 9 from the Green Belt and their identification for development. None of these three areas fulfil essential Green Belt functions, and their exclusion is necessary to meet identified	No	Noted and welcomed.

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		development needs and demand. It is also consistent with national policy, especially as the sites together are deliverable within the meaning of PPS3 and PPS12.		
Location 8 & 9: Joint Comments in Support	B5.48 b)	<p>It is contended that the land to the north of the motorway (Location 8) does not make any essential contribution to the purposes of the Green Belt as set out in PPG2. This includes that it does not play a role in checking the unrestricted sprawl of large built-up areas, that it does not prevent neighbouring towns from merging into one another, that it does not assist in safeguarding the countryside from encroachment, that it does not preserve the setting and special character of historic towns and that it does not assist in urban regeneration by encouraging the recycling of derelict and other urban land. This area also meets the criteria for developability as set out in PPS3, including:</p> <ul style="list-style-type: none"> • The site is well-contained by the existing built-up area to the north and west and by the motorway to the south and Fox's Bank Lane to the east. • The site is close to existing social, community and retail facilities, It is within walking distance of Whiston Town Centre and the added spending power it would generate would help sustain that centre • The northern part of the site is within easy 	No	Noted and welcomed.

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		<p>walking distance (500 metres) of Whiston Railway Station. The station is also a major public transport interchange</p> <ul style="list-style-type: none"> • The site is close to existing areas of employment, including the successful industrial and business estate on the opposite side of Windy Arbor Road. • Regular bus services run along the roads bordering the site. Due to the scale of the proposed development, there is considerable potential to enhance these services or provide new ones which would run through the site. • There are no physical or environmental constraints which would prevent development. Parts are best and most versatile agricultural land but this is true for most of Knowsley. The site contains features of nature conservation interest including three SBIs. However many of these features are in poor condition because of lack of management. Hence there is considerable potential for the housing development to provide enhancement through creating linkages in the form of greenspace corridors and long-term management. Equally the site contains the remains of former coal-mining activity. These can be dealt with as part of the housing development process. The site contains some listed buildings and 		

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		<p>archaeological remains but these can be protected as part of the development, including their relevant settings. The site is not at risk of flooding.</p> <ul style="list-style-type: none"> • The overall landscape value of the site is not high. However remnants of the former Halsnead Hall parkland including the woodland and lakes remain. These would be preserved and enhanced and would form an important contribution to the character of the proposed housing development • The site is large enough to provide a full mix of housing types and tenures. It is however especially suitable for aspirational housing for which there is a large need in Knowsley • The site would help to promote low carbon emissions, partly through its closeness to existing and proposed jobs and facilities, and partly because it allows a large enough critical mass that can support innovative carbon reduction strategies, including potentially combined heat and power. • The site is fully deliverable for housing. The key parts are within the control of two developers, and discussions are taking place about the remaining land. 		
Location 8 & 9: Joint	B5.48 c)	The land to the south of the motorway (Location 9) does make more contribution to Green Belt	No	Noted and welcomed.

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Comments in Support		<p> purposes (in accordance with PPG2) than the land to the north of the motorway but its contribution is not essential. Firstly, the area has been previously developed and is contaminated, and therefore it does not have the character of open countryside. In addition, there are realistic options to provide containment and well-defined and defensible boundaries for the area. Although the development of the site would narrow the gap between the towns of Huyton/Whiston and Widnes, there would remain an effective separation, especially as there would be no inter-visibility between the various settlements. There is no conflict arising from the development of the site in terms of preserving the historic environment, as Whiston is not a historic town in terms of PPG2. Finally, the development would make a very significant contribution to the economic development objectives of Knowsley. Furthermore, the location is suitable for employment development and meets the criteria set out in PPS4 as follows: </p> <ul style="list-style-type: none"> • The site is close to the motorway junction which provides the intersection between the M62 and M57 motorways. The M62 motorway is the most important economic development corridor in the North West and has seen some of the highest levels of development of inward investment activity within the Region. However Knowsley's 		

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		<p>existing and proposed land supply provides few significant opportunities for economic development within this corridor. The M57 provides important linkages to North Merseyside and has experienced significant economic development in the past. The site's location at the junction of the two motorways is very important.</p> <ul style="list-style-type: none"> • The site is highly accessible to John Lennon Airport via the Knowsley Expressway (A5300). The Airport has already witnessed significant growth and is likely to become one of the major economic development poles in the Sub-Region. • The site would be able to attract businesses within key target sectors identified by the Council because of its accessibility and potentially high amenity. These target sectors include large logistics and distribution users, advanced manufacturing and knowledge based industries, and offices. • Although the site is not currently located adjacent to the existing urban area, this will change once the land on the north side of the motorway starts to be developed for housing. The layout and development of the two sites can be integrated so that the potential for sustainable transport and carbon reduction measures are maximised. 		

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		<ul style="list-style-type: none"> • A major part of the site is previously developed as it was the former Cronton Colliery. Employment development on the wider site south of the motorway can be integrated with the current proposals by the Land Trust for a country park on part of the former colliery. • There are no insuperable environmental or physical constraints which would prevent the development of the site for employment. The former colliery land is severely contaminated and contains the remains of previous coal working, including colliery waste and mineshafts. However these constraints would be dealt with as part of the restoration and remediation of the land for employment development and Country Park provided the development is of sufficient scale. • The site contains SBIs but these can be integrated into the overall development without harm. The areas proposed for development are not at risk of flooding. • The development is deliverable. The site is in the in the control of two developers and the Land Trust. Development is viable provided it is of sufficient scale. Nearly all the land required is in the control of two development companies. 		
Location 8 &	B5.48 d)	The release of the sites north and south of the	No	Noted and welcomed.

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9: Joint Comments in Support		motorway represents a major strategic opportunity for Knowsley. In particular, it creates the opportunity for a major strategic gateway development at a key entrance into the Borough off the M62 motorway.		
Location 8 & 9: Joint comments regarding phasing	B5.49 a)	It is considered that the whole area north of the motorway should be planned comprehensively, and the first phase should be off Lickers Lane as it is better placed for public transport and local facilities, including Whiston Railway Station, than the land in the south-west of the site off Windy Arbor Road. These should not be separated into different tiers.	Yes	The Council from a strategic perspective is focused upon the identification of suitable land within the Green Belt capable of release to meet Knowsley's future development needs which otherwise cannot be met in the urban area. Nevertheless the Council has carefully considered the housing supply position since the Core Strategy Preferred Options stage resulting from updated evidence within the Strategic Housing Land Availability Assessment (2012 Update), together with the requirements of the NPPF to incorporate an additional buffer (of either 5 or 20%) of deliverable sites. In this regard, it was considered that the initial phasing proposals were considered too onerous and inflexible to adequately support the promotion of sustainable growth and appropriate residential development to meet Knowsley long term needs. The phasing mechanism has therefore

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				<p>been simplified accordingly within the Local Plan to reflect reserve locations (those required during the plan period) and safeguarded locations (those required to meet needs after 2028).</p> <p>The Council does not intend to specify site specific preferences for phasing of development at this stage, with such a process more appropriately identified through detailed master planning, including consideration of mitigation works and potential time bound constraints. Land to the South of Whiston is therefore identified as a single reserved location suitable for residential development in Policy CS 5.</p>
Location 8 & 9: Joint comments regarding phasing	B5.49 b)	There is an issue about the timing of the release of the proposed employment development at Cronton Colliery. The site is likely to be more attractive to the key economic development target sectors than the sites currently proposed for release in Tiers 1 and 2. Of special importance, the site is within the key M62 motorway corridor which is one of the prime economic drivers in the Sub-Region. The employment supply proposed by the Preferred Options Report is deficient in sites of this type and potential quality which is likely to mean that	Yes	The Council from a strategic perspective is focused upon the identification of suitable land within the Green Belt capable of release to meet Knowsley’s future development needs which otherwise cannot be met in the urban area. Nevertheless the Council has carefully considered the employment land supply position since the Preferred Options stage noting a number of consents for development of

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		<p>important economic development opportunities are lost to the Borough. There is also the advantage that an early release would allow the employment proposals to be integrated with the proposed reclamation of the part of the derelict colliery to a country park and so avoid wasted expense to the public purse. The only reason given for the later phasing of the site is its lack of linkage with the existing urban area. However this can be resolved by integrating the development of the site with that of Site 8 to the north of the motorway, including the creation of new sustainable transport links.</p>		<p>previously allocated employment land for residential purposes, together with the requirements of the NPPF for sustainable economic growth. In this regard, it was considered that the initial phasing proposals were considered too onerous and inflexible to adequately support the promotion of sustainable growth and appropriate employment development to meet Knowsley long term needs. The phasing mechanism has therefore been simplified accordingly within the Local Plan to reflect reserve locations (those required during the plan period) and safeguarded locations (those required to meet needs after 2028). Cronton Colliery (and adjacent land south of M62) consequently is included in the former, and it is accepted that there may be benefits of comprehensively developing this area through a master planned approach alongside the nearby broad location at Land to the South of Whiston, particularly in addressing infrastructure requirements.</p>
Location 8 & 9: Joint	B5.49 c)	<p>Alterations to be made include:</p> <ul style="list-style-type: none"> The two parts currently making up Location 8 - 	Yes	The Council has carefully considered the housing and employment land

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comments regarding phasing		<p>Windy Arbor Road and Lickers Lane - should be shown as one strategic site or broad location. It should be shown in the first phase of releases but the Core Strategy should recognise that its size (1,900 dwellings) means that its contribution to housing supply would be phased over the full plan period (and probably beyond).</p> <ul style="list-style-type: none"> Area 9 (Cronton Colliery and land south of M62) should be shown for release within the first phase of releases because of the very important contribution it can make to meeting the economic development of the Borough. 		<p>supply positions since the Preferred Options stage resulting from updated evidence, new commitments and the requirements of the NPPF. In this regard, it was considered that the initial phasing proposals were considered too onerous and inflexible to adequately support the promotion of sustainable growth and appropriate residential and employment development to meet Knowsley long term needs. The phasing mechanism has therefore been simplified accordingly within the Local Plan to reflect reserve locations (those required during the plan period) and safeguarded locations (those required to meet needs after 2028).</p> <p>Land to the South of Whiston is now included as a reserved location suitable for residential development and due to the absence of phasing Tiers, is no longer sub divided.</p> <p>Cronton Colliery is also included as a reserved location (rather than previously safeguarded), to reflect it now being required to meet Knowsley's</p>

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				employment land needs during the plan period. This is noting the interim loss of employment land supply in other parts of the Borough and to provide sufficient flexibility to ensure delivery of sustainable economic growth.
Location 8 & 9: Joint comments regarding phasing	B5.49 d)	If a choice about which sites to locations to be released in order needs be made, Locations 8 and 9 (land north and south of the motorway) should be given a higher priority for release. These two sites have considerable sustainability and other advantages over the other sites identified as locations for Green Belt release.	Yes	The Council from a strategic perspective is focused upon the identification of suitable land within the Green Belt capable of release to meet Knowsley's future development needs which otherwise cannot be met in the urban area. Nevertheless the Council has carefully considered the housing supply position since the Preferred Options stage resulting from updated evidence within the Strategic Housing Land Availability Assessment (2012 update), together with the requirements of the NPPF to incorporate an additional buffer (either 5% or 20%) of deliverable sites. In this regard, it was considered that the initial phasing proposals were considered too onerous and inflexible to adequately support the promotion of sustainable growth and appropriate residential

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				development to meet Knowsley long term needs. The phasing mechanism has therefore been simplified accordingly within the Local Plan to reflect reserve locations (those required during the plan period) and safeguarded locations (those required to meet needs after 2028). Land to the South of Whiston is identified as a single reserved location for residential development in Policy CS 5.
Location 8 & 9: Master planning	B5.50 a)	<p>All of the land proposed for development north and south of the motorway should be planned comprehensively so that it has the maximum strategic and sustainability benefits for the Borough. A Concept Master plan for the whole area has been prepared. Its key features include:</p> <ul style="list-style-type: none"> • The two sites north and south of the motorway would be developed comprehensively. • The site to the north of the motorway would be developed for around 1900 dwellings. As part of its development, the existing woodland and water areas would be integrated into an integrated network of greenspace corridors running through the site. The existing historic parkland would be restored and extended so that it becomes a major feature of the development providing identity and character. 	Yes	The Council has carefully considered the housing and employment land supply positions since the Preferred Options stage resulting from updated evidence, new commitments and the requirements of the NPPF. In this regard, it was considered that the initial phasing proposals were considered too onerous and inflexible to adequately support the promotion of sustainable growth and appropriate residential and employment development to meet Knowsley long term needs. The phasing mechanism has therefore been simplified accordingly within the Local Plan to reflect reserve locations (those required during the plan period)

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		<ul style="list-style-type: none"> • A wide mix of housing would be produced including affordable units. The emphasis would however be on the provision of aspirational housing of which there is an agreed major shortage in Knowsley. • Because of its critical mass, the development would provide a wide range of social and community facilities. It is also of sufficient size to fund other major infrastructure, including public transport initiatives and low carbon technologies. This is an important sustainability advantage over other smaller sites • The main vehicular access into the housing development would be off Lickers Lane with secondary accesses off Windy Arbor Road and Fox's Bank Lane. There would also be sustainable transport linkages from other points to ensure full integration with the existing urban area and into the proposed employment development area south of the motorway. • The housing development would be phased over the full plan period and beyond. • The land south of the motorway would be developed for employment development and integrated with the country park which is being proposed by the Land Trust for part of the colliery site. • The employment area would be laid out so that 		<p>and safeguarded locations (those required to meet needs after 2028).</p> <p>Land to the South of Whiston is now included as a reserved location suitable for residential development and due to the absence of phasing Tiers, is no longer sub divided.</p> <p>Cronton Colliery is also included as a reserved location (rather than previously safeguarded), to reflect it now being required to meet Knowsley's employment land needs during the plan period. This is noting the interim loss of employment land supply in other parts of the Borough and to provide sufficient flexibility to ensure delivery of sustainable economic growth.</p> <p>It is accepted that there may be benefits of comprehensively developing this area through a master planned approach alongside the nearby broad location at Land to the South of Whiston, particularly in addressing infrastructure requirements.</p>

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		<p>it provides for large logistics and distribution users, advanced manufacturing including knowledge-based industries, and offices. It has the potential to attract types of business occupiers to Knowsley which other sites within the Core Strategy proposed employment land supply could not.</p>		<p>The requirement for Green Belt locations to be comprehensively master planned is outlined in policy CS5.</p> <p>The Council notes the suggestions of potential benefits and facilities to be provided as part of the detailed design of any scheme. Nevertheless such issues and factors will be appropriately considered and secured as required as part of the planning application process.</p>
Location 8 & 9: Master planning	B5.50 b)	<p>Treating areas at Locations 8 and 9 as distinct sites, which would be developed separately and over different timescales, would create a missed opportunity and would result in a much less satisfactory form of development. A comprehensive, master planned development over the three sites would have major advantage over a piecemeal approach.</p>	Yes	<p>The Council has carefully considered the housing and employment land supply positions since the Preferred Options stage resulting from updated evidence, new commitments and the requirements of the NPPF. In this regard, it was considered that the initial phasing proposals were considered too onerous and inflexible to adequately support the promotion of sustainable growth and appropriate residential and employment development to meet Knowsley long term needs. The phasing mechanism has therefore been simplified accordingly within the</p>

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				<p>Local Plan to reflect reserve locations (those required during the plan period) and safeguarded locations (those required to meet needs after 2028).</p> <p>Land to the South of Whiston is now included as a reserved location suitable for residential development and due to the absence of phasing Tiers, is no longer sub divided.</p> <p>Cronton Colliery is also included as a reserved location (rather than previously safeguarded), to reflect it now being required to meet Knowsley’s employment land needs during the plan period. This is noting the interim loss of employment land supply in other parts of the Borough and to provide sufficient flexibility to ensure delivery of sustainable economic growth.</p> <p>It is accepted that there may be benefits of comprehensively developing this area through a master planned approach alongside the nearby broad location at Land to the</p>

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				South of Whiston, particularly in addressing infrastructure requirements. The requirement for Green Belt locations to be comprehensively master planned is outlined in policy CS5.
Location 8 & 9: Master planning	B5.50 c)	Both sites should be designated as strategic sites because of their importance to the delivery of the overall development strategy for the Borough (PPS12 paras 4.6 and 4.7). The alternative is that the sites are identified as Broad Locations for Development.	Yes	<p>The Council has simplified the phasing in CS 5 (as explained above) and has therefore now included both Land to the South of Whiston (residential) and Cronton Colliery as reserved locations (employment) required for development to meet Knowsley's needs during the plan period.</p> <p>The Council however does not consider that it is appropriate to designate either location as a strategic site within the Local Plan Core Strategy, rather than a broad location for Green Belt release. The justification for this conclusion is that although the development of these sites remains necessary during the plan period to meet local needs, the Local Plan priorities remain focused upon investment in regeneration priorities, urban locations and previously</p>

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				development land, before reserved sites in the Green Belt are considered. As a consequence, it is extremely unlikely in view of the associated trigger mechanism in CS 5 that Green Belt sites will be required before the adoption of the Local Plan: Site Allocations and Development Policies, which will provide supplementary policy detail to the Green Belt approach together with site specific land use allocations.
Location 10: Land at Knowsley Village: Support	B5.51 a)	The land adjoins the boundary wall of Knowsley Park, but the majority of the boundary is screened by belts of mature trees, so that the visual impact into and out of the Park will be moderated. The use to be allocated to the land within the site, where it adjoins the Park wall, needs to be appropriate to enhance the separation of any development from the historic Park. The part of the site at Home Farm Road adjoins the section of the Park wall that has been rebuilt in block work rather than the traditional attractive sandstone.	No	Noted. The Council believes that the preservation of historic assets and the character of Knowsley Park can be met alongside planning for growth in suitable locations. This is central to the approach taken within the Core Strategy with appropriate safeguards for design and local settings provided within Local Plan policies (e.g. CS 19 and CS 20). Notwithstanding the above, in the interest of clarity, it should be acknowledged that Land at Knowsley

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				Village remains a safeguarded location in Policy CS 5. As a consequence, the Council considers that development in this location is only likely to take place after 2028 (i.e. after plan period of the Local Plan) unless required to maintain a five year (inclusive of a 5% or 20% buffer) deliverable supply of housing land.
Location 10: Land at Knowsley Village: Support	B5.51 b)	The fields adjoining Home Farm Road are subject to trespass and this limits the potential stocking and cropping of the land. It is not possible to keep livestock on the land and any straw or hay produced from the land needs to be removed speedily before it is damaged. The production from this land is a small proportion of the total output of the farm and the removal of the land from the farm holding would not have a significant impact on its profitability. A survey of the land quality will be undertaken and the results provided to Knowsley Council.	No	Noted and the information is welcomed.
Location 10: Land at Knowsley Village: Support	B5.51 c)	The site is classified as a site of biological importance. This only relates to the occasional use of the land by geese for grazing or as a buffer to the parkland itself which is a site of biological importance. It is believed that the site has very little significance in relation to supporting bio-diversity.	No	Noted. The Council commissioned a Sustainability Appraisal of all Green Belt locations, including the land surrounding Knowsley Village. The SA has informed, along with other evidence base documents, the findings of the Green Belt Technical Report.

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				The Council believes that environmental and biodiversity objectives can be met alongside planning for growth; subject to appropriate mitigation at a site specific level where required.
Location 10: Land at Knowsley Village: <i>Objection</i>	B5.52 a)	At Flukers Brook Lane, Knowsley Village, the area identified includes fine agricultural land. Where is our food to come from? No thought has been given to this at all.	No	Noted. The quality of agricultural land has been considered in selecting the locations for Green Belt release. This is demonstrated in the Council's evidence base, including the Green Belt Study.
Location 10: Land at Knowsley Village: <i>Objection</i>	B5.52 b)	Opposition is made to the use of land at Knowsley Village for housing. The land should not be taken out as its development would lead to a change of character in an area known for its semi rural appearance that is much valued by the local community.	No	The Council is satisfied it has correctly applied national Green Belt policy while undertaking the Green Belt Study. The Council believes that the preservation of historic assets and the character of Knowsley Village can be met alongside planning for growth in suitable locations. This is central to the approach taken within the Core Strategy with appropriate safeguards for design and local settings provided within Local Plan policies (e.g. CS 19 and CS 20). In this regard, there is potential for the character of Knowsley Village to be retained through

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				<p>appropriate design, layout and densities. Nevertheless detailed considerations in this regard are appropriately addressed as part of planning application consideration, rather than imposed as restrictions in the otherwise strategic focus of the Local Plan Core Strategy.</p> <p>Notwithstanding the above, in the interest of clarity, it should be acknowledged that Land at Knowsley Village remains a safeguarded location in Policy CS 5. As a consequence, the Council considers that development in this location is only likely to take place after 2028 (i.e. after plan period of the Local Plan) unless required to maintain a five year deliverable supply of housing land (including a 5 or 20% buffer).</p>
Additional / alternative sites	B5.53 a)	Scotchbarn Lane, Prescot, which was once Beesley and Fildes, including salesroom and offices, could very easily be converted into a useful housing option.	No	The Council is satisfied it has appraised the capacity of the existing urban area via the Strategic Housing Land Availability Assessment and Employment Land and Premises Study.
Additional /	B5.53 b)	The land at the rear and sides of Pottery Close off	No	The Council is satisfied that it has

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alternative sites		Pottery Lane, Whiston, which is a small part of Stadt Moers Park, that was once farm land could be utilised for development. There is more than sufficient parkland area within Whiston especially with the ongoing development from the main park area of Stadt Moers along the old railway line leading to the new proposed open area at Cronton Colliery.		adequately appraised the requirements for Borough parks, such as Stadt Moers Park, over the plan period. The Council's Public Open Space Study addresses this issue and concludes that Borough Parks should be retained. The Council's Green Belt Study and Core Strategy are consistent with the evidence base.
Additional / alternative sites	B5.53 c)	Housing estates should be built at the back of Kirkby where there is no football ground, or at the back of the trading estate. Both areas are full of families.	No	The Council is satisfied it has appraised the capacity of the existing urban area via the Strategic Housing Land Availability Assessment.
Additional / alternative sites	B5.53 d)	At the top of South Ave, Manchester Road, Prescott, there is a cabin plus a grassed area that obstructs the view of any vehicle trying to exit South Ave onto Manchester Road. Also, in Sewell Street, Prescott, there is a garage for sale, which has been empty for some time, right next to vulnerable person's homes, which is an ideal place for a small bungalow.	No	The Council is satisfied it has appraised the capacity of the existing urban area via the Strategic Housing Land Availability Assessment.
Land at Woodlands, Knowsley Village	B5.54 a)	Green Belt restrictions should be lifted at land at Woodlands, Shannon's Lane, Knowsley Village. The land already has a house on it and is used commercially. There is also planning permission for a retail outlet and storage facility. The land is also very close to the village housing estate, the local shops and amenities, and just across the road from	No	The Council is satisfied it has correctly applied national Green Belt policy while undertaking the Green Belt Study. The Study rejected the land in the vicinity of Shannon's Lane as it within an "Essential Gap" between two settlements. The release of this area of

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		an area that is already being proposed for Green Belt removal within the Core Strategy.		land would be in conflict with national Green Belt policy.
Land at Shrogs Farm / Radshaw Nook, Kirkby	B5.55 a)	Support is given to the credentials of the land for short term release from the Green Belt for development purposes (employment, hotel and possibly for other uses).The land is ideally placed to accommodate part of the Borough's development needs in the short to medium term future.	No	The Council is satisfied it has correctly applied national Green Belt policy while undertaking the Green Belt Study. The Study rejected the land in the vicinity of Shrogs Farm as it is within an “Essential Gap” between two settlements. The release of this area of land would be in conflict with national Green Belt policy.
Land at Shrogs Farm / Radshaw Nook, Kirkby	B5.55 b)	The site has been the subject of considerable discussion and correspondence in recent years, and the possible release of the site was considered by the Knowsley Replacement UDP examination in 2005. The site was then described as “... surrounded by major roads, is no longer viable as an agricultural unit and is in a sustainable location”. The site is approx 8 acres and adjacent to a Strategic Investment Area. The site has also been subject to Compulsory Purchase of Property: Notice to Treat since 2003 by Merseytravel for Line 1 for Merseytram.	No	Noted.
Land at Shrogs Farm / Radshaw Nook, Kirkby	B5.55 c)	The land was considered as part of the Joint Employment Land and Premises Study, and was dismissed as a development opportunity. There are questions around the robustness of the interrogation of the site as part of this study.	No	The Council is satisfied with the robustness of the Employment Land and Premises Study which was carried out jointly with neighbouring authorities by independent consultants.

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Land at Shrogs Farm / Radshaw Nook, Kirkby	B5.55 d)	It is felt this site would be the most likely to provide a high profile development and not be in conflict with PPG2. The site has been often promoted to date and warrants inclusion in the category of "Reserved" Tier 1 Locations to meet development needs for employment in Table 5.54 Page 75 of Preferred Option CS5.	No	The Council is satisfied it has correctly applied national Green Belt policy while undertaking the Green Belt Study. The Study rejected the land in the vicinity of Shrogs Farm as it is within an "Essential Gap" between two settlements. The release of this area of land would therefore be in conflict with national Green Belt policy.
Land at Shrogs Farm / Radshaw Nook, Kirkby	B5.55 e)	Green Belt around this site it is narrow and dominated by three artificial embankments provided as public engineering works, with high speed roads on top. The site is sandwiched between two of them, and is effectively in a depression and can make little contribution to the openness in such circumstances. The quality of the break between Gilmoos and Kirkby previously benefited from adjacent open land within the Liverpool City Boundary, but this quality has been eroded by the recent large warehouse developments in this area.	No	The Council is satisfied it has correctly applied national Green Belt policy while undertaking the Green Belt Study. The Study rejected the land in the vicinity of Shannon's Lane as it within an "Essential Gap" between two settlements. The release of this area of land would be in conflict with national Green Belt policy.
Land at Shrogs Farm / Radshaw Nook, Kirkby	B5.55 f)	There seems a happier relationship between the built development to the east and open land lying between it and the motorway embankment since the buildings are of a considerably lesser scale.	No	The Council is satisfied it has correctly applied national Green Belt policy while undertaking the Green Belt Study. The Study rejected the land in the vicinity of Shrogs Farm as it within an "Essential Gap" between two settlements. The release of this area of land would be in conflict with national

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				Green Belt policy.
Land at Shrogs Farm / Radshaw Nook, Kirkby	B5.55 g)	Land to the east of the site, designated as Green Belt and in/near a conservation area at Knowsley Village, is included as a preferred location in CS5. Policy objections have not been raised against the Green Belt sites that are more in conflict with PPG2 than Shrogs Farm.	No	The Council is satisfied it has correctly applied national Green Belt policy while undertaking the Green Belt Study. The Study rejected the land in the vicinity of Shrogs Farm as it within an “Essential Gap” between two settlements. The release of this area of land would be in conflict with national Green Belt policy.
Land at Shrogs Farm / Radshaw Nook, Kirkby	B5.55 h)	It is proposed that the land at Shrogs Farm / Radshaw Nook no longer serves the purposes of PPG2 and accordingly it should be included in the "Reserved" Tier 1 Locations for Employment in CS5.	No	The Council is satisfied it has correctly applied national Green Belt policy while undertaking the Green Belt Study. The Study rejected the land in the vicinity of Shrogs Farm as it within an “Essential Gap” between two settlements. The release of this area of land would be in conflict with national Green Belt policy.
Land at Woolton Waste Water Treatment Works / Weston House	B5.56 a)	There is an alternative for development at Halewood which should be considered. This is: to use the land identified for development on the edge of Halewood for mixed use urban extensions, enabling the amount of employment land at Halewood to be increased and a better balance of employment and housing to be achieved; and to identify additional land on the edge of Halewood to be developed for housing.	No	The Council’s approach to employment land supply was based initially on needs identified in the Joint Employment Land and Premises Study (JELPS) and then refined taking account of more up to date evidence such as the Liverpool City Region Housing and Employment Evidence Base Overview Study. The Council’s

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				<p>approach is realistic and deliverable in the context of the requirement for sustainable economic growth in the NPPF and historic take up rates.</p> <p>The employment land supply in the Local Plan has necessary flexibility to account for future needs arising through the inclusion of four of the nine Green Belt broad locations in policy CS5 which have potential to be utilised for employment development to meet future needs (if required).</p> <p>The Council supports the need for sustainable economic growth and is mindful of the investment occurring in neighbouring districts. However, employment land provision in Halewood and Knowsley cannot be viewed in isolation. This is noting the proximity of employment areas in Liverpool (e.g. Speke / South Liverpool International Gateway) and Halton (e.g. 3MG), to Halewood which are likely to be able to meet some of Halewood’s employment needs in the future.</p>

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				<p>South Liverpool International Gateway site and the strategic employment site at 3MG in Widnes are both located within about 3 miles of Halewood and remain regional strategic investment priorities in accordance with RSS (as identified by Liverpool and Halton UDPs and their emerging Local Plans respectively). As a consequence, there is a need to consider the potential effect of additional employment land within Halewood, which could undermine these regeneration priorities given the functional linkage between these areas.</p> <p>Furthermore, the approach to employment land supply and land identification must remain proportionate and deliverable, noting that the identification of additional land requirements would put increased pressure on the Green Belt and therefore must be founded on robust evidence with a degree of certainty to ensure deliverability during the plan period. There is no evidence that</p>

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				<p>additional employment land is required specifically in Halewood and such provision could undermine regeneration / employment priorities in neighbouring districts.</p> <p>The Council's approach should not be interpreted as focusing upon quantity alone. The Council's selection of Green Belt locations is supported by the Green Belt Technical Report which drew from the findings of the Green Belt Locations Sustainability Appraisal and an assessment of each location's ability to contribute to the Local Plan's strategic objectives.</p> <p>The identification of remodelling opportunities within Knowsley Industrial and Business Parks, together with broad locations for Green Belt release via the Local Plan are intended to secure a sufficient range, choice and quality sites to ensure sufficient flexibility for and to secure investment across a variety employment sectors, with sufficient flexibility to account for rapid changes in economic</p>

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				<p>circumstances.</p> <p>The suitability of employment land supply to accommodate target employment sectors within the Council’s Economic Regeneration Strategy is assessed within the Planning for Employment Growth Technical Report.</p> <p>Additionally, the Green Belt Study and Green Belt Technical Report concluded that the East Halewood location were most suited to residential development. This is owing to the location’s proximity to existing residential areas and community facilities. Furthermore, there are high levels of developer interest in the locations, which are highly deliverable and marketable to help meet future housing needs.</p>
Land at Woolton Waste Water Treatment Works / Weston	B5.56 b)	The land controlled by United Utilities and Weston House is well placed to form a sustainable extension of the Halewood urban area. It falls in a location which is enclosed by an arc of distinct neighbourhoods within the Liverpool urban area. These neighbourhoods have a range of facilities	No	The Council is satisfied it has correctly applied national Green Belt policy while undertaking the Green Belt Study. The land parcels comprising the Woolton Wastewater Treatment Works, bounded by Lydiate Lane,

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House		and services and are already well served by public transport routes.		<p>Halewood and Weston House are within an essential gap between Halewood and Liverpool. Development within these parcels would significantly reduce this gap. These areas were therefore discounted as inappropriate for Green Belt release at Stage 2 of the Green Belt Study. This is noting that the release of this area of land would be in conflict with national Green Belt policy.</p> <p>It is also considered that development of the location would result in an irregular Green Belt boundary which is poorly defined. The development would protrude into an essential gap with maintains a degree of separation between the north of Halewood and Netherley. It should also be noted that the location forms part of a wider section of Green Belt which continues into Liverpool City Council's administrative area. The Green Belt Study / Green Belt Technical Report notes that development in this location is likely to have a detrimental impact on the wider function of this area of</p>

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				<p>Green Belt.</p> <p>The Council’s Transport Feasibility Study also suggests that the location is poorly served by sustainable modes of travel and would create capacity issues at Gerard’s Lane/Lydiat Lane/Church Road and the junction of Halewood Road/Halewood Drive/Markets Lane through additional trip generation resulting from predominant car use. These issues would need to be addressed in the event of the location being considered for development.</p>
Land at Woolton Waste Water Treatment Works / Weston House	B5.56 c)	New development at this location can be patched in to the existing urban structure in a way that would create an integrated and sustainable pattern of development. There is potential to strengthen infrastructure of services and facilities through the new development.	No	The Council is satisfied it has correctly applied national Green Belt policy while undertaking the Green Belt Study. The land parcels comprising the Woolton Wastewater Treatment Works, bounded by Lydiat Lane, Halewood and Weston House are within an essential gap between Halewood and Liverpool. Development within these parcels would significantly reduce this gap. These areas were therefore discounted as inappropriate for Green Belt release at Stage 2 of the Green Belt Study. This is noting that

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				<p>the release of this area of land would be in conflict with national Green Belt policy.</p> <p>In view of the above, the Council does not accept that proposed development of Land at Woolton Waste Water Treatment Works and Weston House would constitute a sustainable pattern of development.</p> <p>Whilst the Council accepts that additional development in the local area could strengthen infrastructure of services and facilities with benefit to existing residents, this would not constitute very special circumstances to overcome the potential harm to the Green Belt and its objectives.</p> <p>This is also noting concerns expressed in the Council’s Transport Feasibility Study which suggested that the location is poorly served by sustainable modes of travel and would create capacity issues in the local area. These transport issues would need to be addressed in the event of the location being considered for</p>

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
Land at Woolton Waste Water Treatment Works / Weston House	B5.56 d)	There is strong potential to access open space and recreational routes. Development of the site should be progressed so that an effective and commodious network of green space is created, with accessible links between the new and existing areas of development and between the developed areas and the open areas beyond.	No	<p>development.</p> <p>The Council is satisfied it has correctly applied national Green Belt policy while undertaking the Green Belt Study. The land parcels comprising the Woolton Wastewater Treatment Works, bounded by Lydiate Lane, Halewood and Weston House are within an essential gap between Halewood and Liverpool (Netherley). Development within these parcels would significantly reduce this gap. These areas were therefore discounted as inappropriate for Green Belt release at Stage 2 of the Green Belt Study. This is noting that the release of this area of land would be in conflict with national Green Belt policy.</p> <p>Whilst the Council accepts that additional development in the local area if appropriately designed, could assist the enhancement of the accessibility and quality of the strategic green link between Halewood and the adjoining Gateacre in Liverpool, this would not constitute very special circumstances to overcome the</p>

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				potential harm to the Green Belt and its objectives.
Land at Woolton Waste Water Treatment Works / Weston House	B5.56 e)	The Green Belt study methodology is flawed and has been misapplied in relation to this site and potentially other locations within the study. The explanation of the rejection of this land is unsatisfactory on many counts. It is felt that the land does not fulfil a gap between Halewood and Liverpool, and keeping the land open is not preventing two neighbouring towns from merging into one another. In addition, the land in question is discrete and well contained in terms of its landscape character. There are well defined and distinct boundaries which provide visual separation from adjoining land.	No	<p>The Council is satisfied it has correctly applied national Green Belt policy while undertaking the Green Belt Study. The land parcels comprising the Woolton Wastewater Treatment Works, bounded by Lydiate Lane, Halewood and Weston House are within an essential gap between Halewood and Liverpool. Development within these parcels would significantly reduce this gap. These areas were therefore discounted as inappropriate for Green Belt release at Stage 2 of the Green Belt Study. This is noting that the release of this area of land would be in conflict with national Green Belt policy.</p> <p>The role of the land as an essential gap is to prevent the merger of Halewood with the distinct Netherley “urban peninsula” to the north. In doing so, the land also currently prevents further incremental erosion of uncontained Green Belt land between the two settlements by reinforcing the</p>

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
				physical and defensible boundary provided by the Halewood to Gateacre strategic green link (former Liverpool Loop Line).
Land at Woolton Waste Water Treatment Works / Weston House	B5.56 f)	It is considered that the two locations in Halewood which are identified in CS 5, have been selected contrary to PPG2, due to matters including their characteristics of open countryside, their lack of containment and the role they play in maintaining a gap between Halewood and Widnes.	No	<p>The Council is satisfied it has correctly applied national Green Belt policy while undertaking the Green Belt Study. The Study notes that the gap between Halewood and Widnes is sufficiently wide to accommodate development on either side, without undermining the principles of Green Belt policy of the “wide gap” between the two settlements. Furthermore, the Green Belt Study concluded that development could take place on either side of the gap (adjacent to Halewood or Widnes) without undermining the separation between the two settlements.</p> <p>Furthermore, It should be noted that the gap between Halewood and Widnes is one of the widest within the Borough and visually broken by a dual carriage way and associated landscaping.</p>

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				<p>The Council acknowledges that any new Green Belt boundaries will need to be robust and defensible in line with national Green Belt policy. Policy CS 5 makes it clear that this will be considered as part of the land allocations process (Local Plan: Site Allocations and Development Policies). It is likely that existing physical barriers such as roads, tree lines and vegetation will be reinforced in order to prevent further encroachment into the remaining Green Belt.</p>
Land at Woolton Waste Water Treatment Works / Weston House	B5.56 g)	If this alternative is rejected, the plan would demonstrably have not followed a process that could lead to the inclusion of the most appropriate strategy having regard to the alternatives, and should therefore be found unsound. This unfortunate outcome can clearly be avoided.	No	<p>The Council is satisfied it has correctly applied national Green Belt policy while undertaking the Green Belt Study and has a sound and evidence-based policy approach to this matter.</p> <p>The land parcels comprising the Woolton Wastewater Treatment Works, bounded by Lydiate Lane, Halewood and Weston House are within an essential gap between Halewood and Liverpool. Development within these parcels would significantly reduce this gap. These areas were therefore discounted as inappropriate</p>

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				for Green Belt release at Stage 2 of the Green Belt Study. This is noting that the release of this area of land would be in conflict with national Green Belt policy.
Land at Former Walton Sewage Farm / Axis Business Park	B5.57 a)	There are compelling reasons why this site should be considered as a principal site to serve long term economic development needs in Knowsley. The starting point is the overriding need to promote a sustainable pattern of development with employment sites identified which respond to the needs of existing and emerging economic sectors and which are readily deliverable. With this in mind, the site is a strong candidate location for sustainable economic development in accord with the principles set out in CS2 and should play a significant role in the portfolio of deliverable employment opportunities to meet the needs of established and emerging employment sectors in Knowsley.	No	<p>The Council is satisfied it has correctly applied national Green Belt policy while undertaking the Green Belt Study. The land parcels comprising the Former Walton Sewage Farm / Axis Business Park are within an essential gap between Kirkby and Liverpool. Development within these parcels would significantly reduce this gap and create potential precedent for similar development of the western edge of the Kirkby settlement adjoining the M57. These areas were therefore discounted as inappropriate for Green Belt release at Stage 2 of the Green Belt Study. This is noting that the release of this area of land would be in conflict with national Green Belt policy.</p> <p>The Council acknowledges the potential benefits of the identification additional employment land to securing sustainable economic growth in</p>

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				<p>Knowsley. However such benefits are not considered to constitute very special circumstances that outweigh the potential harm to the Green Belt in this instance.</p> <p>In the interest of clarity it should be noted that any benefits of employment provision in this location, would have to be offset against any potential negative implications for regeneration priorities in Knowsley Industrial and Business Parks, particularly investment in the remodelling of previously developed land. In this regard, it is considered that Knowsley’s Local Plan approach to employment land provision provides the most appropriate spatial balance to serve individual settlements during the plan period. On the basis of the JELPS and other available evidence (see the “Planning for Employment Growth” Technical Report for further details) the provision of additional land in close proximity to Kirkby is not a priority given the potential range and choice available in Knowsley Industrial and Business Parks.</p>

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
Land at Former Walton Sewage Farm / Axis Business Park	B5.57 b)	The site is within in an area which is subject to redevelopment (Axis Business Park). There is infrastructure in place to serve the subject land but the dominant feature is the neighbouring M57 motorway corridor. A combination of existing development and the motorway corridor reduces or eliminates any perception that this land plays an important Green Belt role in the way that it separates settlements.	No	The Council is satisfied it has correctly applied national Green Belt policy while undertaking the Green Belt Study. The Study rejected the land in the vicinity of Axis Business Park as it within an “Essential Gap” between two settlements. The release of this area of land would be in conflict with national Green Belt policy.
Land at Former Walton Sewage Farm / Axis Business Park	B5.57 c)	The site is served by high frequency public transport along the A580 and it is accessible to a significant potential employee catchment. This catchment is burdened by low levels of employment and hence every opportunity needs to be taken to improve job prospects. In addition, the essential infrastructure already exists to facilitate timely development, including access infrastructure, utilities and services.	No	<p>Noted.</p> <p>The Council is satisfied it has correctly applied national Green Belt policy while undertaking the Green Belt Study. The Study rejected the land in the vicinity of Axis Business Park as it within an “Essential Gap” between two settlements. The release of this area of land would be in conflict with national Green Belt policy.</p> <p>The Council is satisfied it has chosen the correct Green Belt “broad locations” to support longer term growth and meet the needs of Knowsley’s communities, while making efficient use of land, services and infrastructure.</p>

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
Land at Former Walton Sewage Farm / Axis Business Park	B5.57 d)	Axis Business Park is a key project in the Approach 580 Gateway which is promoted by Liverpool Vision as a focus for economic investment on the arterial link between Liverpool and Manchester. The site has the potential to significantly expand the successful development of Axis Business Park and when viewed alongside the remaining undeveloped land at this location, will create a substantial and deliverable opportunity which is well positioned to attract occupiers. The supply of suitable floorspace to meet projected demand is limited (units of over 100,000 sq ft).	No	<p>The Council is satisfied it has correctly applied national Green Belt policy while undertaking the Green Belt Study. The Study rejected the land in the vicinity of Axis Business Park as it within an “Essential Gap” between two settlements. The release of this area of land would be in conflict with national Green Belt policy.</p> <p>The Council is satisfied it was chosen the correct urban regeneration priorities and Green Belt “broad locations” to support longer term growth and meet the needs of Knowsley’s communities, while making efficient use of existing services and infrastructure.</p>
Land at Former Walton Sewage Farm / Axis Business Park	B5.57 e)	It is a location that has particular advantages over the other sites in the Green Belt identified in CS5, which are not as well served by infrastructure and ownership constraints cast doubt over their deliverability.	No	The Council is satisfied it has correctly applied national Green Belt policy while undertaking the Green Belt Study. The Study rejected the land in the vicinity of Axis Business Park as it within an “Essential Gap” between two settlements. The release of this area of land would be in conflict with national Green Belt policy.

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
				The Council is satisfied it was chosen the correct Green Belt “broad locations” to support longer term growth and meet the needs of Knowsley’s communities, while making efficient use of existing services and infrastructure.
Land at Junction 4 of the M57 (Epicentre NW)	B5.58 a)	Developers are jointly are proposing to bring forward a comprehensive set of proposals involving the establishment of the Epicentre NW sports complex near to Junction 4 of the M57. The complex would incorporate a national facility for polo, other equestrian sports and a regional centre the Modern Pentathlon. Other elements would incorporate a range of homes including some provision for elderly and dementia care, a hotel, an outdoor education centre, and linked commercial/industrial development in the adjacent business park. The proposals would be sensitive to local environmental assets, preserving the open nature of critical areas, enhancing and improving access to local woodlands, planting up firm boundaries against future encroachment, and offering bridleway and footpath network improvements.	No	The Council is satisfied it has correctly applied national Green Belt policy while undertaking the Green Belt Study. The Study rejected the land in the vicinity of the Epicentre NW proposal as it within an “Essential Gap” between two settlements. The release of this area of land would be in conflict with national Green Belt policy.
Land at Junction 4 of the M57	B5.58 b)	Objection is made the identification of the area as an Essential Gap and it is considered that the north-eastern portion of the site should be released from	No	The Council is satisfied it has correctly applied national Green Belt policy while undertaking the Green Belt

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(Epicentre NW)		the Green Belt as this would not alter the material function of the Gap or purpose of Green Belt. It is suggested that the whole of this location should be kept open in order to define the existing settlement gaps between Kirkby and Knowsley Village and Croxteth. It is considered that the existing gap between Kirkby and Knowsley Village in particular has already been significantly eroded by the expansion of Knowsley Industrial Park down from Kirkby towards Knowsley Village. The industrial park is clearly visible across from Knowsley Lane.		Study. The Study rejected the land in the vicinity of the Epicentre NW proposal as it within an “Essential Gap” between two settlements. The release of this area of land would be in conflict with national Green Belt policy.
Land at Junction 4 of the M57 (Epicentre NW)	B5.58 c)	The initial Green Belt boundary was tightly drawn almost 30 years ago, and has not been subject to detailed review, leaving anomalous pockets of land surrounded by development and similar development incursions into predominantly open areas. While a clear boundary might once have been able to be clearly defined by Knowsley Lane to the east and School Lane to the north, developments to the west of Knowsley Lane have blurred the distinction between the Green Belt and built up area.	No	Noted.
Land at Junction 4 of the M57 (Epicentre NW)	B5.58 d)	It is important to note that by releasing the north-eastern portion of the site for housing and elderly/dementia care, a significant Essential Gap will still be left. The existing gap is very wide at this location and that it would make a more logical and robust Gap if the width were maintained along this	No	The Council is satisfied it has correctly applied national Green Belt policy while undertaking the Green Belt Study. The Study rejected the land in the vicinity of the Epicentre NW proposal as it within an “Essential Gap”

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		length of the M57.		between two settlements. The release of this area of land would be in conflict with national Green Belt policy.
Land at Junction 4 of the M57 (Epicentre NW)	B5.58 e)	<p>This location is preferable to the other identified “Tier 1”, “Tier 2” and “Safeguarded” location within the Green Belt, which are considered to be constrained by issues such as flood risk, existing land quality, accessibility and biodiversity value, and which also have less defensible Green Belt boundaries and options for containment. The location at Junction 4 of the M57 is preferable for a variety of reasons, as follows:</p> <ul style="list-style-type: none"> • The land does not fulfil the purposes of Green Belt, as it is already punctuated by development, it does not prevent the merger of neighbouring towns and it would form a defensible Green Belt boundary. • The proposals involve the retention and enhancement of the existing Site of Biological Interest and wider landscape proposals. • The site is not prime agricultural land. • The entire site is within Flood Zone 1. • The site is easily accessible by public transport • The site is also in close proximity to the shops and amenities of Knowsley Village and employment opportunities within the nearby Knowsley Business and Industrial Parks, and Village. 	No	<p>The Council is satisfied it has correctly applied national Green Belt policy while undertaking the Green Belt Study. The Study rejected the land in the vicinity of the Epicentre NW proposal as it within an “Essential Gap” between two settlements. The release of this area of land would be in conflict with national Green Belt policy.</p> <p>Further evidence published since the Preferred Options stage has explored in further detail issues such as flood risk, sustainability and transport feasibility. This has resulted in adjustments to the assumed development capacity and phasing of some of the locations proposed for release from the Green Belt. There is however no need in the Council’s view to alter the preferred locations which should be identified.</p>

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
		<ul style="list-style-type: none"> • The development will also benefit from immediate access to recreational land and facilities. • The development of the eastern plot for homes and elderly/dementia care will provide much needed additional homes and accommodation in the area. • The wider proposals and associated development would include sports and recreation facilities and uses that would not unduly impact upon the overall openness and function of the Green Belt. • The existing site is currently poorly managed and maintained. The proposals will involve the rejuvenation of the site through the provision of additional landscaping. • The proposals will benefit Knowsley Village and surrounding urban areas by providing access to sporting facilities and additional recreational space. 		

Policy CS6: Town Centres and Retail Strategy	
List of respondents	
<ul style="list-style-type: none"> Mr Simon Clarke (ID: 588426) , Highways Agency Mr Neil Scales (ID: 588428) , Merseytravel Christine Duffin (ID: 588372) , Homes and Communities Agency Tom Hatfield (ID: 588368) , Sefton Metropolitan Borough Council Mr David Aspin (ID: 408207) , Knowsley Age UK / Age Concern Dr Allan Richardson (ID: 587169) Mr Carl Cashman (ID: 559304) , Knowsley Liberal Democrats - Kirkby Branch Jenny Wharton (ID: 560061) , Women for Kirkby's Future 	<ul style="list-style-type: none"> Mrs Joan Fitzsimmons (ID: 560019) Mr John Fleming (ID: 559995) , Kirkby Residents Action Group Mr A Barton (ID: 559985) , 1st 4 Kirkby (ID: 371422) , Grosvenor Liverpool Fund Andrew Boucher (ID: 559025) , Spennithorne Regeneration Limited Rose Freeman (ID: 400832) , The Theatres Trust Mrs Norma Griffiths (ID: 559001) Ian Smith (ID: 371187) , Knowsley Liberal Democrat Group

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
General	B5.60 a)	The Council's intention with respect to retailing in the Borough is to strengthen its existing offer, most notably through the consolidation and regeneration of existing centres. This in itself is non-controversial and in accordance with PPS4.	No	Noted.
General	B5.60 b)	Proposals for developing the local town centres, some of which no longer provide an appropriate and varied range of shops, are welcomed.	No	Noted.

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General	B5.60 c)	Support is given to policies to increase and/or improve upon retail and leisure opportunities within town centres, attracting new and improving existing economy to create better choice and variety.	No	Noted and welcomed.
General	B5.60 d)	New retail should only be developed in centres or locations where existing public transport and other sustainable modes are present and good. Other sites should only be considered when no sites in locations with good public transport and sustainable modes of access are available. In these instances then only sites which can easily acquire good access should be considered, and the provision of this new transportation infrastructure / services should be borne as a cost of development.	No	The Council agrees with this statement, and is seeking to achieve these objectives through the Core Strategy.
General	B5.60 e)	Firm support is given to the Council’s policy approach for major retail developments within town centres. Adherence to the very important principle of directing large scale retail developments only to the more major centres of Kirkby, Huyton and Prescot should be paramount. This would maximise the chances of achieving fully integrated transport solutions across this part of the metropolitan area, which should achieve the aim of minimising the frequency and length of additional private car journeys.	No	Noted and welcomed. The Council also agrees with the latter statement relating to ‘fully integrated transport solutions’, and is seeking to achieve these objectives through the Core Strategy.

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General	B5.60 f)	It is questioned whether CS 6 will enhance the equal role of Knowsley’s centres when the new retail plan for Kirkby will place it much higher than Huyton and Prescott in the Knowsley and North West retail hierarchy. This is likely to make CS 6 unachievable as the three centres will no longer maintain their equal role within the Knowsley hierarchy.	No	The Council’s approach towards the three main centres was informed by evidence from the Knowsley Town Centres and Shopping study, with the spatial distribution of the centres and their respective sizes ensuring an equal role in focusing upon increasing expenditure retention within their individual catchment areas. In this regard, irrespective of different proportions of proposed growth reflecting both opportunity and local need, it is considered that no single centre is capable of attaining a dominant position under the proposals which would adversely impact upon the other centres.
General	B5.60 g)	Huyton and Prescott have a significant heritage which is in danger of being totally lost.	No	The Council sets out its approach to long term preservation and enhancement of local assets and historic importance through policies CS 14 (specific to Prescott Town Centre) and CS 20, which complement the strategic town centre and retail strategy of CS 6.

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General	B5.60 h)	While the individual town centre policies contain aspirations to improve their evening economies there should be overarching guidance in CS 6 to relate to this key issue.	Yes	Additional wording has been provided in policy CS 6. The Council agrees that there is a need for consistency in identifying support for enhancements to the evening economy across multiple policies.
General	B5.60 i)	The current wording of CS 6 is too restrictive in terms of the potential phasing of comparison goods retail development, with the result that development in one town could be constrained by permissions in another, given all three towns are considered to have equal roles. The inclusion of a phasing table for comparison goods retail development is also inconsistent with the approach adopted for convenience goods retail development. CS6 should also be amended to remove the reference to phasing	Yes	The Council agrees that the phasing of comparison retail development in the Preferred Options document had unintended consequences in terms of the potential constraints of development across all three centres if a large development (i.e. Kirkby town centre) was implemented early in the plan period. To mitigate this situation the policy and supporting text (including associated tables) have been amended to prioritise delivery of existing opportunities which will increase expenditure retention from the catchment areas of Knowsley's centres in the short term. Flexibility for complementary sustainable growth opportunities that may arise, is retained over the latter part of the plan period appropriate to scale of centre. This is noting the uncertainty regarding prevailing economic circumstances

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				<p>and the resultant difficulties of accurate forecasting. Consequently a range of floorspace is utilised, with monitoring indicators directing the floorspace requirements to the areas of need to focus on the priority centres and account for delivery in each 5 year period, before higher proportions of floorspace are released.</p> <p>The variation of approach with regard to phasing in terms of comparison and convenience floorspace is considered justified in view of the differing spatial priorities for growth.</p>
General	B5.60 j)	CS 6 provides a hierarchy in which Kirkby, Huyton and Prescot have equal status. A conflict arises in CS 10: Kirkby Town Centre.	No	Noted. The Council however supports its approach as per the detailed response to ROC Para Ref B5.60 f).
General	B5.60 k)	There is dismay at the apparent ease with which retailers of controlled substances such as off licenses and pharmacies obtain necessary licences to trade. These types of retailers sometimes seem to be over-represented in communities, and there are real concerns about the clientele that they attract, often from outside the local area and often during long opening hours.	No	The Council considers that this issue falls outside of the scope of the Core Strategy as it is not a matter relating to strategic planning policy. The issue instead relates to rights conferred by the Town and Country Planning (General Permitted Development) Order 1995 (as amended) or alternatively decisions on individual planning applications.

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Kirkby	B5.61 a)	Greater clarity should be provided as to the Council's intentions for Kirkby Town Centre and the amount of retail floorspace that is expected to come forward in this location. At present, the document is vague and leaves significant concerns as to its impact on higher order centres including that of Liverpool City Centre	No	The Council supports its approach in providing a range of potential floorspace with a maximum and minimum threshold, which encourages sustainable economic growth but also provides flexibility for the town centres, including Kirkby, to ensure capability of responding to changing economic circumstances during the plan period.
Kirkby	B5.61b)	Reference should be made to the granted outline planning permission for Spenhill and that its implementation is regarded as delivering the planned expansion of the town centre.	No	The Council considers that a reference to the existing outline planning consent within the supporting text is sufficient, with cross reference to more specific detail relating to Kirkby Town Centre in policy CS10.
Kirkby	B5.61c)	The proposed expansion of Kirkby Town Centre is much more modest than the development proposals that were rejected at a Public Enquiry in 2008, and therefore would not have a major detrimental impact on Bootle Town Centre.	No	Noted.
Kirkby	B5.61d)	Objection is made to CS 10, in particular the expansion of Kirkby Town Centre, on the grounds that there is sufficient land in the existing Town Centre to provide an appropriate retail development within Kirkby. Opposition is given to the inclusion of the residential areas known as Eagles Court, Hadrian's Way and Spicer Grove as part of the Kirkby Town Centre Regeneration Action Area. This	No	The Council supports its approach, given that the Knowsley Town Centres and Shopping study is clear that delivery of new retail would need to include a scheme of sufficient critical mass comprising up to 39 700 sq.m of additional comparison floorspace and a major new superstore in Kirkby Town

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		objection is given because of the confusing and contradictory messages it sends out. It is felt that there is a real prospect that CS6 will fail due to CS10.		Centre during the plan period to engender confidence amongst investors and potential new operators. Due to restrictions in the amount of land available within the current town centre boundary this necessitates consideration of strategic expansion of the town centre, with land to the immediate south offering the most appropriate area for expansion. The Council has subsequently granted outline planning permission in accordance with these suggested requirements.
Kirkby	B5.61e)	The Council is seeking "to retain the existing retail hierarchy within Knowsley"..."broadly in terms of PPS4", but this will not be possible to achieve due to the Council granting outline planning permission for the Spenhill / Tesco application.	No	Noted. The Council however supports its approach as per the detailed response to ROC Para Ref B5.60 f).
Prescot	B5.62 a)	It is suggested that an extension to the hours of car parking from 2 hour to 3 hours in Prescot Town Centre be considered.	No	The Council considers that this issue falls outside of the scope of the Core Strategy as notwithstanding a reference in the NPPF to car parking charges, it is a matter determined by non planning decision making at a local level rather than strategic planning policy.

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Prescot	B5.62 b)	There is a strong view that the Tesco development has been allowed to exert too much influence in Prescot leading to the general demise of the local shopping facilities.	No	Noted. The Council however supports its approach in seeking to enhance the future viability and vitality of Prescot Town Centre through improved integration of the primary shopping area of Eccleston Street with Cables Retail Park to encourage an enhanced range of town centre uses, services and facilities.
Huyton	B5.63 a)	Huyton Town Centre is lacking a good variety of shops. Cavendish Walk is a nice development, but have the proposals for the Sherborne Square improvements been cancelled? What is needed is a major retail store, like Marks and Spencer, to come into the area. They would do well and would attract a different clientele to the existing clothing stores.	No	The Council agrees that a priority for Huyton Town Centre is to improve its retail offer. The Council considers that the appropriate policy approach is to provide flexibility for investment in Huyton Town Centre during the plan period through offering a range of potential new retail floorspace. This reflects expected opportunities and need for sustainable economic growth, whilst providing capability and flexibility to respond to changing economic circumstances during the plan period.
Halewood	B5.64 a)	When exactly can it be expected that work will begin on the shopping centre at Raven Court? Residents find it frustrating and annoying to receive publications showing other parts of the borough enjoying facilities long denied to Halewood, which is dependent on a weekly visit from a veggie man,	No.	Noted. The Council agrees that the delivery of the Ravenscourt development is a priority and considers that the current approach encourages the delivery of regeneration opportunities within Halewood district

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		butcher and mobile shop within the district centre. Halewood is getting a raw deal.		centre and at Ravenscourt, noting that an existing permission has been granted and is approaching completion.
Floorspace and tables 5.5, 5.6 and 5.7	B5.65 a)	Further clarity is required to ensure that the floorspace ranges set out in CS 6 and Tables 5.5 and 5.7 are explicit that they relate to new planning permissions granted from 2011 onwards and exclude any previous permissions that may have been permitted but not implemented	Yes	<p>The Council agrees that there is a need for greater clarity in terms of how existing permissions are treated relative to the floorspaces ranges in CS 6. Additional wording has been provided in the supporting text.</p> <p>In the interest of clarity it should be noted that the floorspaces ranges include extant permissions.</p>
Floorspace and tables 5.5, 5.6 and 5.7	B5.65 b)	Table 5.6 should be removed and CS 6 reworded accordingly. A suggested wording would be "New comparison goods floorspace will be broadly distributed as set out in Table 5.5 'Preferred Indicative Distribution of New Comparison Retail Floorspace 2011-2027'. The phasing of development should reflect market demand, with more development expected in the early part of the plan period." Paragraph 5.3 needs to be amended and updated to reflect the fact that outline planning permission has now been granted for the Kirkby town centre development.	No	Noted. The Council supports its approach to phasing of development of new comparison retail floorspace. This is noting that it remains proportionate to focus upon delivery of existing opportunities to increase expenditure retention from the catchment areas of Knowsley's centres in the short term. Flexibility for complementary sustainable growth opportunities that may arise, is retained over the latter part of the plan period appropriate to their scale, but is necessarily phased given the uncertainty regarding

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
				prevailing economic circumstances and the resultant difficulties of accurate forecasting. Consequently a range of floorspace is required, with monitoring indicators directing the floorspace requirements to the areas of need to focus on the priority centres and account for delivery in each 5 year period, before higher proportions of floorspace are released.
Floorspace and tables 5.5, 5.6 and 5.7	B5.65 c)	Policy support is given for the provision of additional retail floorspace over and above that which has recently been approved in Kirkby Town Centre. Whilst the plan period exceeds the timescales for the approved application for the redevelopment of Kirkby Town Centre by some ten years, it is of concern that the Preferred Options document allows for an additional (circa) 15,000 sq.m (gross) of comparison goods retailing to come forward in this location by 2027 (this is unless this takes into account the demolition and replacement of existing retail floorspace). Allowances should be made for growth during the plan period, given the scale of retail development already approved. However, an additional (circa) 15,000 sq.m seems excessive (particularly for a centre such as Kirkby) and at odds with the conclusions of the Inspector in respect of the application for the redevelopment of	Yes	The Council supports its approach in planning for the growth of town centres which is considered proportionate relative to evidence within the Town Centres and Shopping study. However the policy and the associated supporting text (including floorspace and distribution tables) have been modified and updated. The amendments were necessary to clearly define that any headroom above the lower range required to support a moderate enhancement of the performance of each centre, will only be released based upon delivery and proportionate to each centre. The extra headroom provided in the range of floorspace is necessary to provide

Theme of Issue (<i>subtitle from ROC</i>)	ROC Para Ref	Summary of Issues Raised (<i>bullets taken from ROC</i>)	Changes made (<i>yes/no</i>)	Additional Council comments (<i>rationale behind why policy was changed</i>)
		<p>the Town Centre that was dismissed in 2008. In the event that the additional (circa) 15,000 sq.m (gross) does take into account the demolition of existing retail provision in the Town Centre (the Preferred Options document does not specify), it is noted that any replacement floorspace is likely to turnover at a much higher level than that of existing floorspace. The Council should ensure that the turnover of proposed replacement floorspace has been properly assessed in compiling its evidence base to support the type and scale of development that is being proposed in the emerging Core Strategy. The replacement of existing floorspace in Kirkby Town Centre cannot be seen as 'like for like' and the implications of replacement floorspace vs. existing, including that of impact on higher order centres in the region, should be properly assessed.</p>		<p>flexibility for delivery of other development opportunities that may arise in the latter part of the plan period to provide positive benefit in enhancing the function of a particular centre. However the delivery of the upper range is less certain in the current economic climate and therefore must necessarily be linked to monitoring and build rates in the early and middle time periods of the plan to ensure appropriate phasing, distribution and proportionate growth of Knowsley's centres relative to those surrounding.</p> <p>In addition to the above, the supporting text has also been modified to improve the clarity relating to the floorspace requirements representing new floorspace (i.e. additional, after demolitions), with supplementary information available in the Retail Technical Report.</p>

Policy CS7: Transport Networks	
List of respondents	
<ul style="list-style-type: none"> Mr Jermaine Daniels (ID: 370866) , Merseyside Environmental Advisory Service (MEAS) Nicholas Milner (ID: 588438) , Peel Holdings (Land and Property) Limited Mr Simon Clarke (ID: 588426) , Highways Agency Mr Neil Scales (ID: 588428) , Merseytravel Christine Duffin (ID: 588372) , Homes and Communities Agency 	<ul style="list-style-type: none"> Peter Davis (ID: 587093) Diane Clarke (ID: 588337) , Network Rail Mr DAVID ASPIN (ID: 408207) , Knowsley Age UK / Age Concern Nicola Meredith (ID: 587242) Mr John Lawday (ID: 587134)

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
General	B5.67 a)	Welcome is given to the support for the Liverpool SuperPort concept and the references made to the importance of both the Airport and Liverpool’s Ports. In addition appropriate reference should be made to the Atlantic Gateway, an important regional / sub-regional concept and where appropriate shared objectives should be highlighted.	Yes	References to Atlantic Gateway have been added to supporting text.
General	B5.67 b)	The references made to the Airport Master Plan and the support given within the Core Strategy to both the expansion of Liverpool John Lennon Airport and the delivery of the Eastern Access Transport Corridor, are welcomed	No	Noted
General	B5.67 c)	CS7 is broadly compatible with the Waste DPD, including its vision, strategic objectives and	No	Noted

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		sustainable waste transport policy		
General	B5.67 d)	The alternative option 7A, to reject not giving support to currently unfunded transport schemes, is supported. This should engender flexibility on future transport solutions. It would also allow for strategic highway mitigation measures or improvement schemes to be brought forward as may be needed within the plan period.	No	Noted
Public transport	B5.68 a)	The ongoing support of the Council for the rail electrification project is welcomed.	No	Noted
Public transport	B5.68 b)	Strong support is given to the encouragement of a modal shift away from car based transport, and policies which promote sustainable transport. It is recommended that green travel plans are introduced.	No	There is already a requirement for a travel plan to accompany an application for new development excluding smaller scale proposals. Smaller scale proposals are to be defined in a Supplementary Planning Document.
Public transport	B5.68 c)	There are six bus stations across Merseyside including Huyton Bus Station. These are major assets and key hubs in the bus network.	No	Noted
Public transport	B5.68 d)	There are issues with bus timetables, connectivity and ticketing synergies between Halewood, Huyton, Prescot and Kirkby. It is questioned whether these issues could be resolved by bus companies working together and Merseytravel and the Council exerting their influence where possible	No	Policy CS7 states that the Council will work with regional and sub-regional partners to give priority to schemes which ... would provide for ...enhanced provision of buses. The Council continues to work closely with its partners Merseytravel through the implementation of the Local Transport

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
Public transport	B5.68 e)	Opportunities must be taken to improve public transport provision in Knowsley wherever new development presents them. Despite good public transport links in an East / West direction (especially to the hub of Liverpool) it remains difficult to travel between individual localities of Knowsley. For example, journeys between Halewood in the South and Kirkby in the North are hardly possible by public transport, and those living in outlying areas of Prescot have to use two buses to reach the town centre of Huyton. A greater willingness to influence Merseytravel and the individual transport operators seems to be required	No	Plan. Policy CS7 states that the Council will work with regional and sub-regional partners to give priority to schemes which would provide for the enhancement of the principal bus routes through Quality Bus Partnerships and Quality Bus Contracts.
Public transport	B5.68 f)	Buses in terms of their network routes and capacity are generally flexible; however this comes at a cost. Each extra vehicle in the network costs around £100,000 plus per year, every mile costs about £3.50. The cost of accommodating changes to the bus network should be mitigated by locating developments close to existing routes. Detailed designs can make it easy to route bus services directly through development and high quality design is also important. It is recommended that the Council should refer to existing best practice and the Institution of Highways & Transportation (IHT) "Guidelines for Planning for Public Transport in Developments".	No	The Core Strategy covers a period of 15 years. The suggested document may not be in print for all of the plan period. Policy CS7 states that new development will be required to be located and designed to prioritise accessibility and sustainable modes of travel through a choice of walking, cycling, and public transport.

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
Public transport	B5.68 g)	The taxi sector can make an important contribution to improving accessibility to key opportunities and services in particular for Merseyside's most disadvantaged groups and areas. As part of LTP3, there is a need to facilitate a greater role for taxis. There is scope for improved management of taxi ranks including measures such as raised access kerbs or bays to allow safe loading of the less mobile into taxis.	No	Policy CS7 states that new development will be required to be located and designed to prioritise accessibility and sustainable modes of travel through a choice of walking, cycling, and public transport. Raised access kerbs or bays, although important, are not considered to be a strategic matter and should not therefore be contained within the Core Strategy.
Public transport	B5.68 h)	In the Infrastructure Delivery Plan that will in due course accompany the Local Development Framework and as consideration starts to be given to Community Infrastructure Levy issues, consideration should be given to including to the transport measures outlined in Merseytravel's infrastructure schedule as shared with the Council.	No	See CS27 for detailed response. The Council has every intention of working with its partners at Merseytravel in developing its infrastructure planning activities.
Traffic and congestion	B5.69 a)	In selecting sites for future residential and employment development, it should be ensured that impacts do not adversely impact upon the strategic road network. It is realised this consideration has to be fairly balanced with the needs of urban regeneration. However potential developers should be required to assess traffic impacts via transport assessments including travel plan considerations.	No	Policy CS7 states that new development will be required to be accompanied by Transport Assessments and/or Travel Plans.
Traffic and congestion	B5.69 b)	Support is given to measures which reduce the need to travel by private car as this should minimise	No	Policy CS7 states that new development will be required to be

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
		<p>traffic impacts upon the strategic road network. Any new development or land use intensification which would attract significant trip generation should be supported by a robust evidence base which justifies their location in transport terms and where necessary should be supported by a transport assessment.</p>		<p>accompanied by Transport Assessments and/or Travel Plans.</p>

Policy CS8: Green Infrastructure	
List of respondents	
<ul style="list-style-type: none"> Mr Jermaine Daniels (ID: 370866) , Merseyside Environmental Advisory Service (MEAS) Barratt Homes (ID: 588440) Mr Carl Cashman (ID: 559304) , Knowsley Liberal Democrats - Kirkby Branch 	<ul style="list-style-type: none"> Mr Paul Daly (ID: 389928) , Sport England - NW Region Ms Dawn Hewitt (ID: 370989) , Environment Agency Mrs Judith Nelson (ID: 370871) , English Heritage - NW Mr Alan Hubbard (ID: 419883) , The National Trust Mr Tom Ferguson (ID: 370941) , The Mersey Forest

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
General	B5.71 a)	Strong support is given to this comprehensive approach to Green Infrastructure which will provide the basis of developing detailed proposals over time to ensure that GI will play a significant role in delivering the strategic priorities for Knowsley. Delivery mechanisms outlined are also supported.	No	Noted and welcomed.
General	B5.71 b)	Support is given to the positive and strategic approach to Green Infrastructure in CS8, which recognises the wide range of important benefits that green infrastructure does and can bring to Knowsley	No	Noted and welcomed.
General	B5.71 c)	Green Infrastructure provides opportunities for a wide range of sports including not only pitch based sports such as football and cricket, but also sports such as orienteering, cycling, canoeing, rowing, sailing, motorsports, etc. It is therefore important to seek to maintain Green Infrastructure as it provides	Yes	The Council agrees that the sporting benefits of Green Infrastructure are important. Additional wording has been provided within the supporting text of Policy CS 8 to clarify the sporting benefits of Green Infrastructure.

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		a natural resource for sporting activities. The objective to maintain and enhance existing green infrastructure is therefore supported.		
General	B5.71 d)	The inclusion of the historic environment in the consideration of Green Infrastructure is welcomed	No	Noted.
General	B5.71 e)	Recognition and support is given to the requirement to ensure adequate protection of Green Infrastructure, however it is important to balance this against the need for the Borough to deliver the development it needs in the most sustainable manner. It is important to provide sufficient flexibility and contingencies to ensure that policies do not become restrictive and act as an unnecessary barrier to delivering sustainable growth, potentially resulting in less sustainable routes to growth having to be taken.	No	The Council supports its approach to Green Infrastructure in CS 8, as it is intended to support and promote the environmental aspect of sustainable development. In doing so, the policy provides necessary clarity and protection for spaces providing beneficial Green Infrastructure functions, whilst providing a balanced complement to other policies within the Core Strategy which have a greater focus upon sustainable economic and housing growth.
General	B5.71 f)	The Council should explain its policy of creating the "corridor effect" in parts of Kirkby - the length of Simonswood Lane from County Road to Quarryside Drive is enclosed by unsightly steel palisade fencing that make this area very unattractive and is visually damaging for local residents. One solution would be to move the fencing back to restore some space to improve visually amenity residents enjoyed before the LFC academy was built in the area.	No	The Council considers that this issue falls outside of the scope of the Core Strategy as it relates to specific existing highway infrastructure that remains outside of planning control and therefore is not a matter that can be addressed through strategic planning policy.

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
General	B5.71 g)	A corridor effect has been created on County Road Kirkby from its junction with Hall Lane to St. Kevin's Drive. This is a major arterial route into Kirkby that once had open views. To give CS8 integrity, measures should be taken to relieve the sense of enclosure in this area. It is noted that the Longview Lane site in Huyton is circled by Liverpool Road, around a large open green space that has fencing of a high quality and set well back from grass verges facing residential properties. Why do three sites near residential properties receive different policy treatment in different areas of the borough? There is a need for greater consistency on these types of Green Infrastructure issues.	No	The Council considers that this issue falls outside of the scope of the Core Strategy as it relates to specific existing highway infrastructure that remains outside of planning control and therefore is not a matter that can be addressed through strategic planning policy.
Changes / additions	B5.72 a)	It is noted that certain aspects of Green Infrastructure are supported by further more detailed policies including CS20 and CS21. It is recommended that a similar policy is provided for biodiversity.	No	The Council considers that Policy CS 8 provides sufficient clarity regarding the strategic approach of protection, maintenance and improvement of both existing and new biodiversity assets / ecology, therefore an additional policy specific to biodiversity is not necessary.
Changes / additions	B5.72 b)	In relation to climate change, it is suggested that tree planting is added to the list of possible adaptation measures. It is appreciated these are only by way of example, but tree planting will be a significant and achievable means of reducing urban temperatures and surface runoff.	Yes	The Council agrees that the tree planting within the wider category of 'soft landscaping' has significant benefits with regard to mitigating climate change; changes have been made accordingly to Policy CS 8.

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
Changes / additions	B5.72 c)	Definitions for Green Space and Green Infrastructure should be set out, together, within the report. This will enable readers to fully understand the process the Council has followed to focus upon the district's Green Infrastructure. There will be areas and sites that are important for biodiversity and community recreation, which are green spaces, but they will not necessarily fall into the Green Infrastructure network. It would be very beneficial if these sites, and their potential, was recognised.	No	The Council agrees that it is important to define Green Space and Green Infrastructure; however it considers that the approach to do so separately is appropriate. This is noting that green spaces remain one of a number of sub-categories of Green Infrastructure and will always fall within its definition, regardless of whether a site falls within a defined strategic area or not.
Changes / additions	B5.72 d)	The primary method of achieving maintenance and enhancement of Green Infrastructure needs amendment. In relation to sport and recreation, there is no explicit reference to protection. This contrasts with strategically important areas of greenspace, assets which function as ecological frameworks, biodiversity, etc. all of which are identified for specific protection. There is reference to improving accessibility for communities to greenspace offering leisure and recreation opportunities, but if such spaces are not protected there is a question of how this can be achieved. The quality of a sports facility is also important as there is little value if accessibility is improved to a playing pitch which has limited or no additional capacity due to being of poor quality.	Yes	The Council is satisfied that in combination with Policy CS 12 the policy approach appropriately recognises quality of public open space. Nevertheless it is agreed that the protection of sports provision is important; changes have been made to Policy CS 8 to provide clarification in this regard.
Changes / additions	B5.72 e)	There could also be difficulties in terms of applying the definition of Green Infrastructure to some sports	Yes	The Council agrees that the protection of sports provision is important;

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		facilities. For example, some cricket pitches comprise of a relatively small wicket with a synthetic surface and a large grass outfield. Some football pitches comprise of an entirely artificial grass surface, whilst others are a mix of natural grass reinforced by synthetic fibres inserted into the soil. It is unclear whether such pitches are seen as Green Infrastructure.		changes have been made to Policy CS 8 to provide clarification in this regard. Artificial grass pitches are outdoor sport provision and consequently would be considered to be Green Infrastructure.
Changes / additions	B5.72 f)	It is usual for playing pitches and other outdoor sports facilities to be located close to built facilities such as changing rooms, spectator facilities, or indoor sport facilities. In such cases it is unclear whether the Green Infrastructure designation would include the built facilities.	Yes	The Council accepts that there is an occasional need for new ancillary sports facilities, of an appropriate scale, to be located on Green Infrastructure. Changes have been made to Policy CS 8 to provide clarification in this regard.
Changes / additions	B5.72 g)	The report should take account of the Liverpool City Region Ecological Framework and how there are opportunities to build upon the existing biodiversity assets within Knowsley and benefit the City Region	Yes	The Council agrees that there is a need to consider the Liverpool City Region Ecological Framework as part of Green Infrastructure and changes have been made to the supporting text of Policy CS 8 accordingly.
Changes / additions	B5.72 h)	Remove terminology “and the North Merseyside Urban Green Infrastructure Habitat Action Plan”. Terminology should be changed from “site of biological importance” (SBIs) to “local wildlife sites” (LWS) and from “site of geological importance” (SGI) to “local geological sites” (LGS). Combined, there are currently 72 LWS and LGS in Knowsley.	Yes	The Council agrees with the suggested updates and changes have therefore been made to Policy CS 8 accordingly.

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
Changes / additions	B5.72 i)	It should be included that the provision of Green Infrastructure to serve new development must meet the needs of residents “and the environment”.	Yes	The Council agrees that the suggested additional wording better clarifies the focus of this sub-section and changes have therefore been made to Policy CS 8 accordingly.
Changes / additions	B5.72 j)	A new bullet point should be included in part iv) of CS8: “protect, maintain and enhance biodiversity within and around new developments”.	Yes	The Council agrees that the suggested additional wording better clarifies the focus of this sub-section and changes have therefore been made to Policy CS8 accordingly.
Changes / additions	B5.72 k)	There is little reference to ecological functionality in its own right. Recognition should be given to the specific requirement to provide habitats that function.	No	The Council considers that its approach already includes appropriate reference to the ecology and movement of wildlife.
Changes / additions	B5.72 l)	The wording “ <i>maintenance</i> ” can be a double-edged sword in terms of biodiversity. Hence, it is recommended clarity is provided to ensure good ecological potential is not limited by poor habitat management of important sites to nature conservation - in particular, watercourses. Suggested re-wording would include the term “appropriate maintenance”	Yes	The Council agrees that the suggested additional wording better clarifies the focus of this sub-section and changes have therefore been made to Policy CS 8 accordingly.
Changes / additions	B5.72 m)	Outright protection of areas through both appropriate designations and related policy controls should only be provided where the area/space in question fulfils a clear and measurable Green Infrastructure role. This is needed to avoid local deficiencies in standards of open space provision	Yes	The Council accepts that there are some circumstances where protection, management and enhancement of Green Infrastructure cannot always occur or be delivered; therefore changes have been made to Policy CS

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		and where it cannot be proven that the benefits of a development would outweigh the harm caused by the loss the area. To achieve this required flexibility, “where appropriate” should be added to the policy wording in relation to protection, management and enhancement of Green Infrastructure.		8 and the supporting text to provide necessary flexibility for circumstances where such an approach may not be appropriate. However the addition of “where appropriate” is not considered suitable as it would provide unnecessary subjectivity relating to the requirement of individual schemes to deliver the policy objectives.
Changes / additions	B5.72 n)	Reference should be made to how all new development opportunities will make “space for nature” as set out in the Natural Environment White Paper. In addition, links from the above can be made with the Environment Agency's “Make Space for Water” guidance.	Yes	The Council agrees that there is a need to make space for nature and changes to Policy CS 8 have been made accordingly.

**Policy CS9: Principal Regeneration Area – North Huyton
and Stockbridge Village**

List of respondents

- Mr Jermaine Daniels (ID: 370866) , Merseyside Environmental Advisory Service (MEAS)
- (ID: 588440) , Barratt Homes
- Christine Duffin (ID: 588372) , Homes and Communities Agency

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
General	B7.2 a)	The need to deliver the regeneration of North Huyton and Stockbridge Village as part of the overall objective of delivering a more balanced housing market is not contested. However, there are significant reservations about the ability of weaker housing market areas within the area, to deliver the overall level of housing growth allocated (i.e. 3,060 dwelling net of clearance). Many sites within these areas are constrained by their historic uses and the viability of their development, particularly in the current economic climate, is marginal. Failure to deliver sufficient levels of housing within the urban area will put the Council under pressure to release less sustainable sites. To avoid this pressure and the resultant unsustainable spatial pattern of growth, it is vital that the Core Strategy supports targeted growth in more stable housing market areas which provide more certainty	No	The scale of development planned in North Huyton and Stockbridge Village is in accordance with the permissions and master plans in place for these areas. The constraints to delivery in the short term are recognised within the Core Strategy. The Council has sought a balance between protecting urban regeneration priorities while maintaining a sufficient supply of housing land Borough-wide.

**Policy CS9: Principal Regeneration Area –
North Huyton & Stockbridge Village**

Accounting for Preferred Options Responses

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
		of delivery, e.g. in South Huyton.		
	B7.2 b)	There is no mention of employment land within Huyton in this preferred approach.	No	Noted. The Council however considers that reference to employment land is unnecessary, given that the policy approach is focused upon housing led regeneration of the areas in question.

Policy CS10: Principal Regeneration Area – Kirkby Town Centre

List of respondents

- Christine Duffin (ID: 588372) , Homes and Communities Agency
- Tom Hatfield (ID: 588368) , Sefton Metropolitan Borough Council
- Mr Carl Cashman (ID: 559304) , Knowsley Liberal Democrats - Kirkby Branch
- Jenny Wharton (ID: 560061) , Women for Kirkby's Future
- Mrs Lawday (ID: 588811)
- Mr Marcus Hudson (ID: 560008) , Lancashire County Council
- Mr John Fleming (ID: 559995) , Kirkby Residents Action Group
- Mr A Barton (ID: 559985) , 1st 4 Kirkby
- Andrew Boucher (ID: 559025) , Spennithorne Regeneration Limited
- Mrs Norma Griffiths (ID: 559001)
- Ian Smith (ID: 371187) , Knowsley Liberal Democrat Group

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
General	B7.4 a)	The continuing emphasis within the Strategy, on the comprehensive regeneration of Kirby town centre and the residential area of Tower Hill linking economic, residential, transport and health issues to create a more sustainable town centre is supported.	No	Noted and welcomed.
General	B7.4 b)	Kirkby is going to be drastically improved which can only help the area. It all appears to have been brought about by the building of a Tesco store.	No	Noted.
General	B7.4 c)	The proposed expansion of Kirkby Town Centre is much more modest than the development proposals that were rejected at a Public Enquiry in 2008, and would not have a major detrimental impact on Bootle Town Centre.	No	Noted.

**Policy CS10: Principal Regeneration Area
– Kirkby Town Centre**

Accounting for Preferred Options Responses

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
General	B7.4 d)	Residents are pleased to see all the changes that are in the pipe line, for Kirkby. A lot of changes to the town centre have happened over the last 50 years, but they have been mostly cosmetic. It would be preferable to have a covered town centre for much more pleasant shopping, like Bootle or St.Helens. The design of St Chad's Parade could be covered by a dome which would help. Residents do not want more betting shops but do need some big stores like Marks and Spencer, etc. and a DIY shop. It is also important to remember that not everyone in Kirkby has cars to get to the centre.	No	The Council recognises the need to enhance the retail function and service provision in Kirkby, and is seeking to achieve this through the Core Strategy. However the proposed policies remain strategic in focus and seek to encourage investment. Specific design and site specific uses are more appropriately dealt with as part of planning application considerations.
General	B7.4 e)	The list of town centre uses set out should include those recently permitted under the outline planning permission and therefore also refer to restaurants, pubs/bars, takeaways and cafes, professional and financial services, a replacement health centre and library. It should also be explained that implementation of the recently granted outline planning permission will secure the planned expansion of the centre, which will form part of Kirkby town centre and its primary shopping area.	No	The Council considers that the acknowledgement of the existing planning consent and its status is most appropriate in the supporting text rather than the policy itself. Whilst mindful of the positive influence of the existing planning consent in terms of achieving the broad objectives, the strategic policy must retain necessary flexibility to adapt to changes in circumstances that may arise during the plan period and accommodate any other appropriate developments that may also occur. In any case, the reference in policy to 'town centre uses, services and facilities' includes

**Policy CS10: Principal Regeneration Area
– Kirkby Town Centre**

Accounting for Preferred Options Responses

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
				all the uses currently consented, noting the definition of town centre uses provided in the Glossary.
General	B7.4 f)	Opposition is given to the expansion of Kirkby Town Centre on the grounds there is sufficient land in the existing Town Centre to provide an appropriate retail development within Kirkby.	No	The Council is satisfied that its policy approach is appropriate. This is noting that Knowsley Town Centres and Shopping study is clear that the delivery of new retail would need to include a scheme of sufficient critical mass comprising up to 39 700 sq.m of additional comparison floorspace and a major new superstore in Kirkby Town Centre during the plan period to engender confidence amongst investors and potential new operators. Due to restrictions in the amount of land available within the current town centre boundary this necessitates consideration of strategic expansion of the town centre, with land to the immediate south offering the most appropriate area for expansion. The Council has subsequently granted outline planning permission in accordance with the suggested requirements.
General	B7.4 g)	An outline application for mixed use development to comprehensively regenerate Kirkby Town Centre	No	The Council supports its policy approach, with the justification as per

**Policy CS10: Principal Regeneration Area
– Kirkby Town Centre**

Accounting for Preferred Options Responses

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		<p>including retail expansion south of Cherryfield Drive was approved by the Council's Planning Committee in March 2011. To support this application the Council produced their own study to justify development that will change the Knowsley shopping hierarchy due to the scale of the proposed new retail for Kirkby. Furthermore in 2008/09 the then Secretary of State upheld the findings of a Public Inquiry into retail, and other uses, in and around Kirkby Town Centre, during which the Council and its partners unsuccessfully argued for extra retail to be built south of Cherryfield Drive on a green field site. The Planning Inspector came to the view; "I find that there is no convincing argument that the need for a retail development of an appropriate scale could not be met within the existing centre". As this conclusion was reached as recent as 2009 it raises concerns as to why the Council is still pursuing the expansion argument whilst at the same time consulting on retaining equal status for its three main shopping centres. There is a real prospect that Policy CS6 will fail due to Policy CS10.</p>		<p>the detailed response to B7.4 f) above. The Council has subsequently granted outline planning permission for a development after consideration of the revised proposal in the context of local, regional and national policy at the time of the decision. The proposed policy accommodates the delivery of development in accordance with the extant permission associated to Kirkby town centre, whilst retaining necessary flexibility to adapt to changes in circumstances that may arise during the plan period and accommodate any other appropriate developments that may also occur.</p>
General	B7.4 i)	<p>A conflict arises in CS10, the supporting text for which states that the Knowsley Town Centres Shopping Study identified a requirement for further retail development in Kirkby Town Centre. In addition, it explains "Due to restrictions in the</p>	No	<p>The Council supports its policy approach which accords with national policy in recognising that residential development can play an important role in ensuring the vitality of centres</p>

**Policy CS10: Principal Regeneration Area
– Kirkby Town Centre**

Accounting for Preferred Options Responses

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
		amount of land available within the current town centre boundary this was likely to necessitate consideration of strategic expansion of the town centre, with the land to the immediate south appearing to offer the most appropriate area for expansion". Yet, the policy seeks to provide residential components within an expanded town centre. So is the Council seeking to expand the town centre to include housing at some future date?		and therefore retains necessary flexibility to accommodate mixed use developments within the plan period, including appropriate residential components where they complement the overall regeneration priorities for Kirkby and its town centre.
General	B7.4 j)	Why is CS10 proposing residential components in Kirkby Town Centre? This is opposed. This is at odds with supporting the demolition of up to 78 properties in Cherryfield Drive to provide a footprint for a new 14,000 sq.m food store.	No	The Council supports its policy approach which aligns with national policy in recognising that residential development can play an important role in ensuring the vitality of centres during the plan period, irrespective of the initial need to relocate residential units to accommodate initial investment in the enhancement of the town centre.
General	B7.4 k)	The inclusion of the residential areas known as Eagles Court, Hadrian's Way and Spicer Grove as part of the Kirkby Town Centre Regeneration "Action" Area is opposed.	No	The Council supports its policy approach, with the justification as per the detailed response to B7.4 f) above.
General	B7.4 l)	Issues around Kirkby's poor access to goods and services, and its failure to grow to a sub-regional size centre, were noted in a study completed in 1982. This contradicts the position in the supporting text of CS10 which explains that the town centre's	No	The Council is seeking to enhance the viability and vitality of Kirkby town centre and considers the policy approach is the appropriate mechanism to promote future

**Policy CS10: Principal Regeneration Area
– Kirkby Town Centre**

Accounting for Preferred Options Responses

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		inability to attract a major food store for almost twenty years, indicates it is not capable of meeting modern food operator needs		investment and development of appropriate scale. Up to date evidence compiled as part of the Knowsley Town Centres and Shopping study supports the proposed policy approach and is reflective of current circumstances.
General	B7.4 m)	<p>There are a number of questions as to why the Council are pursuing the approach in CS10 after granting a planning permission that is in conflict with CS6. These include:</p> <ul style="list-style-type: none"> • Why have the Council failed to take into account a Government decision on the scale of retail development appropriate for Kirkby Town Centre? • Why have the Inquiry's findings not been used to formulate retail policy? • Having been given a direction of travel by an Inquiry (i.e. that there is no convincing argument for the scale of retail development which could not be met in the existing town centre), why have the Council chosen to ignore it and promote retail development of an "appropriate scale" in Kirkby Town Centre as predetermined by the public inquiry? <p>Subsequently, there are concerns around why alternative option 10A, which was the option to retain the existing Kirkby Town Centre with no expansion, was discounted.</p>	No	The Council supports its policy approach, with the justification as per the detailed response to B7.4 f) above. The Council has subsequently granted outline planning permission for a development after consideration of the revised proposal in the context of local, regional and national policy at the time of the decision. The proposed policy accommodates the delivery of development in accordance with the extant permission associated to Kirkby town centre, whilst retaining necessary flexibility to adapt to changes in circumstances that may arise during the plan period and accommodate any other appropriate developments that may also occur.

**Policy CS10: Principal Regeneration Area
– Kirkby Town Centre**

Accounting for Preferred Options Responses

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
General	B7.4 n)	The findings of the Council's retail survey and the identified need for 39,700 sq.m gross of additional floorspace together with a new superstore, is questioned. The survey was undertaken two months after an Inquiry and Government decision rejected a plan that included a retail increase that was contrary to the development plan policy for Kirkby Town Centre. This permitted superstore of up to 9,000 sq.m with a further comparison floor space of at least 2,000 sq.m. It is plainly evident that the Council recycled evidence that had been dismissed by the Public Inquiry some two months earlier.	Yes (to CS6)	The Council supports its approach in planning for the growth of Kirkby town centre as supported by evidence within the Town Centres and Shopping study and separate research commissioned following receipt of the Inspectors Report to verify the potential capacity up to 2016. However it is accepted that there is a need to modify the Policy CS 6, Table 5.5 and the supporting text. This is necessary to clearly define that any headroom above the lower range will only be released by trigger mechanism. The extra headroom provided in the range of floorspace is necessary to account for any additional investment and consequent remodelling within the existing Kirkby town centre towards the latter part of the plan period which could be encouraged by the implementation of the extant permission, and to provide flexibility for complementary and smaller scale interventions that otherwise would be restricted by the capacity for the plan period being limited to the scale of an existing consent. This is noting that the plan

**Policy CS10: Principal Regeneration Area
– Kirkby Town Centre**

Accounting for Preferred Options Responses

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
				period could exceed the timescales for the full implementation of the extant consent by up to ten years.
General	B7.4 o)	Many Kirkby residents hold the view that following the news that the Council had declined to accept an opportunity for a major retail redevelopment of Kirkby Town Centre in 2005, that the Council had other plans to downsize the existing town centre. The permitted Spenhill scheme seems to confirm this has new retail units will be built outside the existing town centre.	No	The Council is supporting the enhancement of Kirkby through sustainable economic growth and attracting investment during the plan period. Although the current extant planning permission to expand the town centre would involve a significant proportion of additional retail floorspace outside the existing town centre, there is no net loss of floorspace within the town centre. Headroom capacity above the extant planning permission is retained over the plan period to allow for complementary in-centre development.
General	B7.4 p)	It is uncertain that Kirkby can attract a Primary Catchment Area (PCA) which has a population in excess 225,000 compared to a population of just over 41,000 in Kirkby, to make the Spenhill plan viable.	No	The Council supports its approach in planning for the growth of town centres. This is noting that the new floorspace requirements over the plan period are derived from levels of uplift in expenditure retention from Kirkby's Primary Catchment Area required to enhance its viability and vitality in accordance with evidence within the Town Centres and Shopping study.

**Policy CS10: Principal Regeneration Area
– Kirkby Town Centre**

Accounting for Preferred Options Responses

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
General	B7.4 q)	<p>There is concern if the policy went forward as currently proposed, due to the level of new retail development discussed in the justification (39,700 sq.m (gross) additional comparison floorspace plus a major new convenience goods superstore). It is understood that the comparison goods element of the superstore is included within the 39,700 sq.m. However, this level of development is significantly higher than the 24,185 sq.m (gross) additional comparison floor space recently approved, and is more similar to the scale of the original planning application that was refused at appeal (47,821 sq.m (gross) additional comparison floor space). This leaves a residual capacity of up to 15,515 sq.m gross. Any retail development in Kirkby Town Centre, over what has been granted planning permission, could undermine the regeneration proposals for Skelmersdale Town Centre. If the policy went forward as is currently proposed, the residual capacity should be tested when the committed scheme is built out and operating in line with the monitoring proposals in CS6.</p>	Yes (to CS6)	<p>The Council supports its approach in planning for the growth of town centres, particularly Kirkby, which is considered proportionate relative to evidence within the Town Centres and Shopping study. However Policy CS 6 and the associated supporting text (including floorspace and distribution tables) have been modified and updated. The amendments were necessary to clearly define that any headroom above the lower range required to support a moderate enhancement of the performance of each centre, will only be released by trigger mechanism. The extra headroom provided in the range of floorspace is necessary to account for any additional investment and consequent remodelling within the existing Kirkby town centre towards the latter part of the plan period which could be encouraged by the implementation of the extant permission, and to provide flexibility for complementary development that otherwise would be restricted by the plan period capacity being limited to</p>

**Policy CS10: Principal Regeneration Area
– Kirkby Town Centre**

Accounting for Preferred Options Responses

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
				the scale of an existing consent. This is noting that the plan period could exceed the timescales for the full implementation of the extant consent by up to ten years.

**Policy CS11: Principal Regeneration Area
– Knowsley Industrial and Business Parks**

Policy CS11: Principal Regeneration Area – Knowsley Industrial and Business Parks

List of respondents

- Mr Jermaine Daniels (ID: 370866) , Merseyside Environmental Advisory Service (MEAS)
- Mr Graham Bee (ID: 397095) , Orbit Investments (Properties) Limited
- (ID: 588436) , Spencer Industrial Estates Limited

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
General	B7.6 a)	CS11 refers to the Principal Regeneration Area of Knowsley Industrial and Business Parks and states that the Council will support the regeneration of these areas. However, it has a strong focus on the Industrial Park, particularly when identifying areas suitable for a mix of new employment development. It is felt that this option needs a balanced approach with reference to the regeneration opportunities that can be secured within the Business Park through the development of mixed use employment-led schemes.	Yes	The Council supports its policy approach having a prioritised focus upon the Knowsley Industrial Park, noting the existing challenges in this area in terms of a lack of coherence of land uses and design which dictate the need for specific interventions to guide potential investment and promote appropriate regeneration. In comparison, Knowsley Business Park has higher quality built form, image, transport links and market appeal, therefore an approach offering general support for a mix of new development is provided (particularly B1 and B2 uses), rather than specific changes or focus upon locations . Minor wording

**Policy CS11: Principal Regeneration Area
– Knowsley Industrial and Business Parks**

Accounting for Preferred Options Responses

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
				changes have however been undertaken to clarify this aspect.
General	B7.6 b)	It has been recognised by the Council that there is a lack of high quality business parks within the borough, therefore the Council should seek to promote sites such as the Knowsley Business Park and allow the delivery of high quality employment schemes which can appeal to new investors as a means to compete with other sites within the wider Liverpool and Manchester regions.	Yes	The Council agrees that there is a need to promote sites such as Knowsley Business Park for high quality employment schemes and therefore endorses the current policy approach. This is noting that the Council is clear in its support for encouraging a mix of new employment development. It would be unreasonable for the Council to specify 'high quality' employment schemes for Knowsley Business Park in the policy, as this would imply that the Council would settle for lower quality elsewhere, thereby undermining the key regeneration objectives. As an alternative, the Council has sought to clarify the emphasis upon high quality development as an overarching requirement of new development applicable to both Parks through minor wording changes.
General	B7.6 c)	It is acknowledged within the supporting text that Knowsley Business Park has a high quality built form and public realm, image and market appeal; however this is not reflected within CS11 which	Yes	Noted. The Council supports the policy approach, but with minor wording changes as per B7.6 b). However the existing challenges in Knowsley

**Policy CS11: Principal Regeneration Area
– Knowsley Industrial and Business Parks**

Accounting for Preferred Options Responses

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		currently offers no support to the further enhancement of the Park through elements of mixed use development. The Business Park needs to deliver a broader range of infrastructure as a means to enhance their offering to attract new businesses. It is essential that this is covered within any future policies to ensure it can be delivered.		Industrial Park in terms of a lack of coherence of land uses and design dictate the need for specific focus and prioritisation of interventions to guide potential investment and promote appropriate regeneration in that area. Nevertheless the Council acknowledges the need for continued investment in Knowsley Business Park which is reflected in its inclusion as part of the Principal Regeneration Area, together with the overarching support for high quality new employment development and the specific interventions proposed for adjoining gateway areas surrounding the A580 and wider linkages intended to raise the profile, accessibility and image of the area.
General	B7.6 e)	Support is given to the Council’s objective of enhancing the existing gateways into the Parks, by creating a positive ‘first impression’ and identity. This will be of benefit to Knowsley Business Park. This can be secured through the delivery of appropriate mixed use, high quality development.	No	Noted and welcomed.
General	B7.6 f)	The gateway locations identified include the location “Boundary Road/Moorgate Road”, but this does not adequately identify that the full Academy Business	Yes	The Council agrees with regeneration potential of the area specified as a gateway location and have therefore

**Policy CS11: Principal Regeneration Area
– Knowsley Industrial and Business Parks**

Accounting for Preferred Options Responses

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		Park site (at A5208 County Road / Lees Road / Arbour Lane) is appropriate for B1 uses. It has always been an aspiration of the Council for a gateway B1 development and the B1 use should not be lost. The site is on the main entrance into Knowsley Industrial and Business Park from the M57 and A580, at the end of Moorgate Road. Many B1 uses can support large numbers of potential staff and therefore the Council should be supporting the potential for significant employment within this area. It is therefore important that the Academy Business Park site is included for B1 use in addition to the B2 & B8 uses already set out in the policy.		amended the reference to “Boundary Road / Moorgate Road” in the policy to more accurately reflect this broad location. However it is not appropriate for the Council to specify the Academy Business Park in this context, as the policy must remain strategic with more detailed site allocations to follow through the Local Plan: Site Allocations and Development Policies.
General	B7.6 g)	The Academy Business Park site is an appropriate location for the provision of a local service centre to provide small scale shopping services to serve the needs of the workforce within the park. There should be flexibility in uses allowed at the site to complement the area which involves shopping facilities that complement the business park.	No	The Council supports its policy approach of a services hub at South Boundary Road with close links to the existing Admin Road local centre as the priority location for shopping and services to meet local needs. The Council does not agree that the Academy Business Park site is an appropriate location for local shopping and services given it is an out of centre location, and noting its proximity to an existing local centre (Park Brow Drive) and Kirkby Town Centre.
General	B7.6 h)	In order that the woodlands within the industrial park “enhance the benefits that these provide as	Yes	The Council agrees with the need to prioritise protection of Local Wildlife

**Policy CS11: Principal Regeneration Area
– Knowsley Industrial and Business Parks**

Accounting for Preferred Options Responses

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		amenity spaces for the users of the Industrial Park”, they will need protecting from future development. This is particularly important for Charley Wood, as it is currently under immense pressure. It is advised that this woodland is given appropriate protection and maintained as a community green space and wildlife habitat for the future.		Sites within Knowsley Industrial and Business Parks as part of wider Green Infrastructure provision. Wording changes have been undertaken accordingly to address this issue.
General	B7.6 i)	The approach is broadly compatible with the Waste DPD allocations and policies. Supporting text provides a direct link to the document, but it is not clear what is meant by utilising waste from the industrial park, but that this would not constitute energy from waste. This is contradictory, as although the Waste DPD does not designate specific sites for this technology, it does include a policy which enables small-scale energy from waste.	Yes	The Council accepts that the supporting text in the Preferred Options document included the possibility of inconsistency with approaches within the Waste Local Plan. Wording changes have been undertaken accordingly to resolve this issue.

**Policy CS12: Principal Regeneration Area
– Tower Hill, Kirkby**

Accounting for Preferred Options Responses

**Policy CS12: Principal Regeneration Area – Tower Hill,
Kirkby**

List of respondents

- No comments
-

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
		No comments		

Policy CS13: Principal Regeneration Area – South Prescott

List of respondents

- (ID: 588564) , Remondis UK Limited
- (ID: 556276) , Prescott Business Park Limited
- Mr Andrew Leyssens (ID: 370943) , United Utilities Property Services Ltd

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
General	B7.10 a)	The broad mixed use redevelopment approach to the South Prescott Area is welcomed. That approach has emerged in recent months through positive engagement and negotiation on an initial illustrative master plan for the former BICC/Prysmian Cables site, which forms the basis of an outline planning application submitted to the Council in August 2011.	No	Noted.
General	B7.10 b)	There are some concerns that CS13 does not provide sufficient flexibility. It must be borne in mind that the South Prescott Area incorporates land beyond one ownership. It is the case that those wider areas are already or are to be developed for commercial/economic development purposes (e.g. traditional business units, etc. at Prescott Business Park; waste management activities at the Tank House). In order that the policy support the mixed use redevelopment of the larger part of the area, the following changes are sought:	Yes	The Council accepts that there is a need for consistency with the definition of economic development applied nationally and the supportive approaches for such uses. Wording changes have been undertaken accordingly. The Council also agrees that the Preferred Options Report was too prescriptive and potentially inflexible in

**Policy CS13: Principal Regeneration Area
– South Prescott**

Accounting for Preferred Options Responses

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		<ul style="list-style-type: none"> • There is an unnecessarily narrow definition of economic development which does not, for example, reflect the definition of economic development as set out in PPS4. This is particularly pertinent to the Carr Lane and Manchester Road 'gateway' sites, where other high quality developments may be secured - e.g. community/leisure; public service buildings; public house/restaurant; nursing home/close care/quasi medical uses, etc. CS13 should allow for this wider range of 'economic development'; • The identification of a precise and inflexible range for residential development is unnecessary and creates a burden on development and the delivery of new homes. It could also hamper the most effective and efficient use of the area in terms of housing delivery, placing a more pressing need for the delivery of homes on Green Belt land. This may also affect economic viability of the scheme and be contrary to the Government's Plan for Growth. There is not any analytical or planning basis for the threshold, nor a justification for this requirement. The current illustrative master plan for the areas indicates a dwelling yield of around 620 		<p>applying a specific range for residential development of South Prescott within the policy. As a consequence, wording changes have been applied to the policy, with a guideline range of expected dwelling yield in the supporting text reflecting the broad objective of mixed use development and based upon potential scenarios which align with density assumptions in the SHLAA. In this regard, a degree of flexibility for any subsequent development is maintained through references to the need for any departure to be appropriately justified through the master planning process.</p>

**Policy CS13: Principal Regeneration Area
– South Prescott**

Accounting for Preferred Options Responses

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
		<p> dwellings; it is therefore suggested that point CS13 should simply refer to new development of around 600 dwellings for the area.</p>		
General	B7.10 c)	<p>It is important that current proposals to establish development and land use principles for South Prescott are not delayed or compromised by the LDF process. Significant investment and resources are being used to plan for its redevelopment. With that in mind it is imperative that proposals are not delayed by having to fit in with the production of site specific policies or SPD which may be some years off. Reference to a site specific SPD is unnecessary as broad proposals for the site should have been defined and approved ahead of any such process. In addition, it would be anticipated that the Site Allocations DPD would reflect the proposals that have emerged for the site. CS13 should, therefore, provide for mixed use regeneration proposals to be brought forward through the Development Management process in the short term.</p>	No	<p>Noted. The Council however supports its current policy approach, as the assumption of potential deliverability of a specific development proposal early in the plan period cannot override the need to plan for sustainable housing and economic growth via the Core Strategy. Necessary flexibility is therefore appropriate to meet the core regeneration objectives by allowing adaptation to a change in circumstances or developer intentions. In this regard it is entirely reasonable for the Council to reserve the right to support the delivery of appropriate development during the plan period through the preparation of additional planning policy documents (as required).</p>
General	B7.10 d)	<p>Other development opportunities would be appropriate to the South Prescott Area. In particular, given the acknowledged absence of sufficient sites within Prescott Town Centre and Cables Retail Park to meet assessed needs for</p>	No	<p>The Council's view is that the evidence within the Town Centres and Shopping study does not support or identify any requirement for out of centre retail development. The provision of such</p>

**Policy CS13: Principal Regeneration Area
– South Prescott**

Accounting for Preferred Options Responses

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
		additional retail development in full, retail and town centre developments of an appropriate type and scale should be considered within the South Prescott Area - subject to the established sequential approach and impact assessments. In parallel to CS6 and CS14 therefore, it may be necessary for CS13 to recognise that retail and other town centre uses may be appropriate, subject to other policy tests.		uses would require sequential assessment, with the Council's initial focus for new retail development in Prescott remaining on locations in the town centre (in support of its viability and vitality and the regeneration priorities of CS 14), then edge of centre (and Cables Retail Park) before South Prescott could reasonably be considered.
General	B7.10 e)	The South Prescott Action Area should be allocated for employment uses, and the area or part thereof should not be reallocated for residential uses. There is nothing to gain by doing this, unless it can be demonstrated that Knowsley will meet its forecast housing targets but not its forecast employment land targets during the plan period. When assessed within the SHLAA 2010, the site scored highly for accessibility, but low for physical suitability and achievability due to the site being contaminated with old and/or unsuitable infrastructure, which infers that an extensive and costly reclamation scheme would be required to rectify this situation. In addition, the local environment may be of concern, with the area bounded by a railway, motorway and industrial development.	No	The Council supports its policy approach which is necessary to provide flexibility of land use to attract investment and ensure deliverability of required regeneration in South Prescott. In doing so, the policy pursuing a mixed use approach reflects the constraints of prevailing economic conditions and identified need for both residential and employment provision during the plan period, which suggests mixed use development of the site would be most appropriate through a master planned approach. Any scheme resulting from this process will necessarily have to suitably mitigate any potential harm that could result from the sensitive

**Policy CS13: Principal Regeneration Area
– South Prescott**

Accounting for Preferred Options Responses

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
				relationship between residential and economic uses, together with existing infrastructure and land constraints.
General	B7.10 f)	The Prescott Business Park and Tank House area have a valuable role to play as employment land in Knowsley, particularly given the identified shortage of employment land availability in the long term, and should remain as such. In addition, the Joint Employment Land and Premises Study classifies the site as Grade B which it defines as a 'good employment site...' The suitability of the site for employment uses is also supported by Property Advisors acted on the behalf of Prysmian Cables & Systems when 61 acres of the site was sold in October 2010. In addition, it is contested that there has been limited interest in the site from the market.	No	The Council agrees that the South Prescott site has significant value for employment uses, as supported by evidence within the Joint Employment Land and Premises study. However the delivery of economic development on the site (aside from some waste uses) in accordance with the UDP is significantly constrained by a worsening of economic circumstances since the study was completed, together with wider trends of a current absence of viability to deliver commercial builds in Knowsley, even on higher Grade sites. The policy approach has therefore had to necessarily consider the optimal policy solution to secure investment in regeneration during the plan period, by balancing the prospect of limited economic development on the site in at least the short / medium term, against the prospect of contingencies with positive benefits such as housing delivery relative to local need providing

**Policy CS13: Principal Regeneration Area
– South Prescott**

Accounting for Preferred Options Responses

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
				a catalyst for mixed use development of the site.
General	B7.10 g)	The nearby Tank House site has recently gained planning consent for use as a Hazardous Waste Facility which will be operational 24 hours a day, and could have impacts on residents sited near to the site, particularly when accounting for the need to segregate housing from heavy industrial uses. Furthermore, the selection of the Tank House site as a hazardous waste facility was decided based on seeking to avoid any detrimental impacts on residential areas which could arise from the industrial operations, or from the 24hr operation of the site. It is suggested that it is unlikely that the aforementioned planning consent would have been granted if the remaining part of Area A of the South Prescott Action Area had already been allocated for housing.	No	The Council supports its policy approach reflecting the constraints of prevailing economic conditions on delivery of existing employment allocations, together with the identified need for both residential and employment provision during the plan period, which suggests mixed use development of the site would be most appropriate through a master planned approach. Any scheme resulting from this process will necessarily have to suitably mitigate any potential harm that could result from the sensitive relationship between residential and economic uses, together with existing infrastructure and land constraints.
General	B7.10 h)	Land at Carr Lane to the west of Prescott is mentioned in CS13. Subject to the provisions of CS5 with regard to Green Belt review, there is scope for this area to be included within the Regeneration Area boundary. The approach to regeneration in South Prescott outlined in CS13 is founded on mixed use principles guided by an overall master planning exercise. This approach is fully supported but it is felt that this master planning	Yes (to CS5 supporting text)	The Council considers that the Green Belt triggers in CS 5 should be consistent for sites subject to potential release to remain robust. However it is accepted that in master planning the South Prescott site there is a need for flexibility in terms of land use to facilitate the potential integration of the Carr Lane site at a later date.

**Policy CS13: Principal Regeneration Area
– South Prescott**

Accounting for Preferred Options Responses

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
		exercise should determine the preferred land use on the subject land. The option of housing or an employment use on the land at Carr Lane would serve to support and not constrain a comprehensive master plan for the South Prescott Regeneration Area.		Amendments to the wording of the supporting text in CS 5 have been completed accordingly.

**Policy CS14: Principal Regeneration Area
– Prescott Town Centre**

Accounting for Preferred Options Responses

Policy CS14: Principal Regeneration Area – Prescott Town Centre

List of respondents

- Mr DAVID ASPIN (ID: 408207) , Knowsley Age UK / Age Concern
- Dr Allan Richardson (ID: 587169)
- (ID: 556276) , Prescott Business Park Limited
- Moya Clarke (ID: 560038)
- Mrs Norma Griffiths (ID: 559001)

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
General	B7.12 a)	The aspects of CS14 which seek to support the future viability and vitality of Prescott Town Centre are broadly in line with policy in PPS4 relating to planning for centres and main town centre uses. However, other aspects of CS14 do not satisfy the policy requirements in PPS4 in terms of planning to accommodate the identified need for retail and other main town centre uses, nor do they comply with the guidance outlined in the draft NPPF. This is because CS14 is predicated on an approach which will not ensure that assessed local needs are met in full. Limited site availability within a centre is not a justification for compromising the delivery of retail and leisure development needs. CS14 should be amended to ensure that all of the assessed needs for Prescott are met in full. It is apparent that is likely to require the identification of additional sites	No	The Council supports its strategic approach which is focused upon sustainable development principles and enhancing the viability and vitality of Prescott town centre, through a sequential approach that balances opportunity with need by clearly defining initial priority for the town centre, before edge of centre can be considered. This includes definition of the broad location of the primary shopping area on Eccleston Street and opportunities for growth along Sewell Street to provide linkage to the edge of centre Cables Retail Park. This provides sufficient capacity to accommodate the levels of growth

**Policy CS14: Principal Regeneration Area
– Prescott Town Centre**

Accounting for Preferred Options Responses

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
		beyond the defined centre given the physical and environmental constraints within the centre. Therefore CS14 should indicate that consideration will be given to additional sites, particularly where they can deliver physical regeneration benefits, employment opportunities and increased investment. Elements of the South Prescott area that are in good proximity to Prescott town centre and the Cables Retail Park (e.g. Manchester Road) would represent an appropriate and sustainable option for meeting the assessed needs of Prescott for additional retail development.		required during the plan period, as evidenced through the Planning for Retail in Knowsley Technical Report, without the need to consider designation of out of centre locations at this stage or provide encouragement for development in these locations that may otherwise have an adverse impact upon Prescott town centre. The strategic approach in the Core Strategy will be supported by detailed site allocations defining the precise boundaries of the town centre and primary shopping area / frontages within the Local Plan: Site Allocations and Development Policies. Policy CS 6 provides the overarching strategy for meeting Knowsley’s retail needs and provides sufficient clarity with regard to the consideration of proposals outside of the defined hierarchy of Knowsley’s centres which will follow the national approach with regards to sequential assessment, without the need to set out a specific approach for Prescott.
General	B7.12 b)	Proposals to improve the retail facilities in Prescott and provide better links to the retail park is going to impact greatly on the shops in Prescott town centre.	No	The Council accepts that there are existing challenges for Prescott town centre in terms of the relationship and

**Policy CS14: Principal Regeneration Area
– Prescott Town Centre**

Accounting for Preferred Options Responses

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		Prescot used to be a vibrant and interesting place to shop, with a mix of unusual retail outlets and chain stores. Now it seems on some days like a ghost town and it almost appears that some of the shopkeepers have given up.		proximity to Cables Retail Park and consequently its existing viability and vitality. However it is considered that the current policy approach represents the most appropriate solution to enhance its function, through recognising and enhancing the individual role and function of each location, focusing investment towards Prescot town centre and promoting development between each location to improve accessibility, promote linked trips and to encourage a complementary relationship between. This is noting that when considering Prescot town centre and Cables Retail Park jointly they are the highest performing location in Knowsley for retail sales.
General	B7.12 c)	The Tesco development has been allowed to exert too much influence leading to the general demise of the local shopping facilities. Therefore proposals for redeveloping town centres are welcomed.	No	Noted, the Council supports its policy approach as per response to B7.12 b).
General	B7.12 d)	How has the massive Tesco store in Prescot helped Prescot town centre? If the museum and library needed to be moved, the vacant Somerfield Store in the town centre would have been an ideal place. Tesco should be approached to help bring this, as	No	Noted, however the Council considers the potential interventions suggested are detailed issues relating to land ownership interests that fall outside of the scope of planning control and

**Policy CS14: Principal Regeneration Area
– Prescot Town Centre**

Accounting for Preferred Options Responses

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
		they must take a huge amount of money from the surrounding area.		therefore cannot be specifically addressed through planning policy.
General	B7.12 e)	Prescot town centre has declined due to the competition from the retail park having a negative effect on the main shopping street area. There are many beautiful buildings in the town centre, as well as a strong mediaeval history. The town could be rebuilt as a mini-Chester with Tudor-look buildings and new trees and signs, etc. This could be done by local tradesmen and any new shops would provide work for local people. It is recognised that this work would be costly, but some of the buildings could be sold off to local builders at a reasonable price, on the understanding that all properties must tie in with the overall look of the town. Lottery and European funding could be applied for so that shops and banks could be refaced, and there are television shows to apply to which regenerate towns and villages.	No	Noted, the Council supports its policy approach as per response to B7.12 b) and is seeking to promote investment through utilising Prescot town centre's heritage assets. However the Core Strategy must remain strategic and therefore the specific interventions / funding sources cannot reasonably be specified at this stage, given a degree of flexibility is required to promote investment during the plan period.
General	B7.12 f)	There are many other things that are needed in the Prescot area, including a new leisure park, a cinema and a bowling alley to produce more jobs and facilities for the local community. These could be built outside the town centre - perhaps on the site of the old BICC club.	No	The Council agrees that the delivery of employment and leisure facilities in Prescot would provide positive benefit to the local area. In this regard, it is considered that the policy approach provides suitable encouragement for investment during the plan period, but must retain flexibility and cannot therefore be prescriptive about specific

**Policy CS14: Principal Regeneration Area
– Prescot Town Centre**

Accounting for Preferred Options Responses

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
				uses. This is noting that delivery is anticipated to be more reliant upon attracting private funding sources or grants during the plan period, given the reduced availability of public sector finance for capital projects.
General	B7.12 g)	Council car parking in Prescot should be extended from 2 to 3 hours, as 2 hours are insufficient for local activities e.g. for attending Prescot Cables football team matches.	No	Noted, however the Council considers the potential intervention suggested falls outside of the scope of planning control at a local level and therefore cannot be specifically addressed through planning policy.
General	B7.12 h)	As with the other town centres, bringing in the parking charges, at a time when there are less people going into the town centres because of the economic downturn, was a huge mistake. Shoppers will go to the retail park because it is free to park there, but how does that help the shops in the main streets?	No	The Council accepts that localised issues such as car parking charges have potential influence on the viability and vitality of Prescot town centre. However it is considered that the strategic policy approach provides a positive approach for Prescot town centre that will mitigate the perceived negative implications of financial decisions that fall outside of the scope of planning control at a local level and therefore cannot be specifically altered through planning policy.
General	B7.12 i)	It is appreciated that the current museum building would have to have costly improvements, but part of the experience of going into the museum is the	No	Noted, however the Council considers that the status of the museum and the specific building within which it is

**Policy CS14: Principal Regeneration Area
– Prescott Town Centre**

Accounting for Preferred Options Responses

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
		building itself. The proposals for the new scheme do not indicate that there is going to be much of the museum facility left. The museum is not publicised enough and the dedicated staff do a fantastic job, with little resources.		located is a land ownership, service provision and asset management consideration, which falls outside of the scope of planning control and therefore cannot be specifically addressed through planning policy.
General	B7.12 j)	It appears that the library and museum, being amalgamated into the One Stop shop will have restricted opening hours, how is this going to help the families who visit both of these attractions?	No	Noted, however the Council considers that the status of the library, museum and one stop shop, together with the specific building(s) within which they are located is a land ownership, service provision and asset management consideration. This issue therefore necessarily falls outside of the scope of planning control and cannot be specifically addressed through planning policy.
General	B7.12 k)	Whatever happened to the proposals for the Shakespeare of the North project? This was not given lottery funding, but this just seems to have been totally forgotten.	No	The Council is seeking to promote investment through utilising Prescott town centre's heritage assets. However the Core Strategy must remain strategic and therefore the specific interventions, projects and funding sources cannot reasonably be specified, focused upon or endorsed at this stage, particularly where delivery remains unsecured. This is noting that a degree of flexibility is required to

**Policy CS14: Principal Regeneration Area
– Prescott Town Centre**

Accounting for Preferred Options Responses

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
				promote investment during the plan period.

Policy CS15: Delivering Affordable Housing

List of respondents

- Mr Andrew Thorley (ID: 485368) , Taylor Wimpey UK Limited
- (ID: 588440) , Barratt Homes
- Victoria Murray (ID: 457367) , Redrow
- Christine Duffin (ID: 588372) , Homes and Communities Agency

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
General	B8.2 a)	The Council has a poor record in this area as shown in the recent reports that Knowsley is in the top four for housing repossessions, present homeowners obviously can't afford the housing Knowsley is providing	No	Noted. Housing affordability is an established problem in Knowsley, as it is elsewhere in the city-region and nationally. The Council has very little control over the affordability of market housing which is for sale or for rent. However, through policy CS15, the Council is seeking to provide through the planning process a range of affordable housing options, to be delivered and managed by registered providers of social housing. This includes different models like social rented, affordable rent and intermediate housing, such as rent-to-buy or shared ownership schemes. These measures should help to alleviate the outstanding needs for affordable housing options in the

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
				Borough.
General	B8.2 b)	Welcome is given to the emphasis on creating a balanced housing market, meeting needs and demands and increasing the delivery of housing at sustainable locations	No	Noted and welcomed.
General	B8.2 c)	Support is given to CS15, which notes the importance of financial viability when providing an element of affordable housing within a proposed market sector housing development. It is vital that this is embraced by the Council when determining proposals for housing developments, particularly during periods of economic downturn. As such, proposals should be assessed on a site by site basis rather than enforcing a blanket minimum of 25% Affordable Housing. This will ensure that any development is not rendered unviable and will allow the Council to meet its housing requirements	No	Noted and welcomed. The Council's approach to setting a target for affordable housing has been subject to support from plan-level economic viability evidence, with the caveat around site-by-site assessments remaining within the policy. This should ensure that no housing developments are placed at risk through being unable to meet policy requirements set by the Council.
General	B8.2 d)	General support is given to the proposed approach to affordable housing provision and particularly the flexibility within this policy which allows for a lower proportion of affordable housing provision where it is demonstrated with appropriate evidence that 25% provision would be unviable. This flexibility is critical to ensuring that the overall strategic housing requirements of the Borough can be met.	No	Noted and welcomed.
General	B8.2 e)	Although CS15 states that the Council will seek legal agreements with developers to secure affordable housing contributions, the mechanisms of	No	Noted. The Council is no longer obliged to publish its schedule of planned SPDs within its LDS, so at the

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		which will be set out within a future SPD, no further detail as to the content of this SPD, or the timetable for its preparation and publication is given.		time of the Preferred Options report, this information was not available. However, since then, the Council has agreed its position on securing wider planning obligations, and hence a firm position about how and when the mechanism of securing affordable housing will operate, has been established.
General	B8.2 f)	The supporting text is objected to as it states that a blanket tenure split of affordable housing between social rented housing and intermediate housing to be 75%:25% respectively will be applied to all residential developments within which affordable housing provision is being sought. Although it is noted that this is suggested within the Council's SHMA, it does not account for the individual circumstances of a site, and could lead to viability issues for a development. As such, this should be re-visited by the Council, and reference to it should be removed from the Core Strategy.	Yes	The Council has revisited this policy area based on viability evidence collated since the Preferred Options consultation was completed. This includes the type of affordable housing the Council is seeking to deliver. This is reflected in the approach set out in policy CS15. The caveat that site-by-site evidence will be accepted remains, meaning that no housing development should be placed at risk due to the Council's requirements for planning obligations for affordable housing provision.

Policy CS16: Specialist and Supported Accommodation

List of respondents

- Christine Duffin (ID: 588372) , Homes and Communities Agency
- Mr David Aspin (ID: 408207) , Knowsley Age UK / Age Concern

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
General	B8.4 a)	Welcome is given to the emphasis on creating a balanced housing market, meeting needs and demands and increasing the delivery of housing at sustainable locations	No	Noted and welcomed.
General	B8.4 b)	The plans for new housing should not overlook the specific needs of an ageing population.	No	Noted. The Council recognises the pressures on housing growth arising from an ageing population, particularly in the long term. Therefore, policy measures are included in the Core Strategy to ensure that housing is well designed, well located and adaptable.
General	B8.4 c)	It is encouraging to note that there appears to be a growing understanding that 1-bedroom properties are not popular even among 1 person households, and this should continue to influence the design and development of older people's housing in the Borough.	No	The lack of demand for one bedroom houses is reflected in Policy CS17, although the Council's evidence base for housing needs does indicate that a small amount of one bedroom housing is required, particularly in the social rented and intermediate sectors.
General	B8.4 d)	Measures to tackle under-occupancy in Knowsley are more likely to be considered by older people if there are realistic options for them to downsize. These options need to extend to owner occupiers and tenants in appropriate proportions	No	Noted. The Council's policies are aimed at re-balancing the housing market, including new market and affordable housing that would represent viable downsizing options.

<p>Policy CS17: Housing Sizes and Design Standards</p> <p>List of respondents</p> <ul style="list-style-type: none"> (ID: 588440) , Barratt Homes Victoria Murray (ID: 457367) , Redrow Christine Duffin (ID: 588372) , Homes and Communities Agency 	
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Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
General	B8.6 a)	Welcome is given to the emphasis on creating a balanced housing market, meeting needs and demands and increasing the delivery of housing at sustainable locations	No	Noted and welcomed.
General	B8.6 b)	Support is given for the proposal that developments of 15 units or more should provide an appropriate mix of dwellings. Ensuring that individual developments provide a mix of dwellings is critical to delivering a more balanced housing market across Knowsley.	No	Noted and welcomed.
General	B8.6 c)	Broad support is given to the need for an appropriate mix of dwelling sizes within the Borough, and the need to have regard to evidence of local housing needs and the monitoring of housing completions. However, the supporting table to CS17 is not supported. The SHMA clearly identifies that certain areas require different proportions of a particular type of housing, and that some areas have shortfalls of some types of properties, while others contain surpluses. This table does not allow for this	No	Noted. The Council considers that the SHMA does not supply sufficiently robust recommendations to enable for the mix of dwelling sizes to be prescribed on a tenure- and area-basis. The recommendations given are indicative only, and give a broad indication of the sizes of houses that the evidence indicates are required to rebalance the housing market. The

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
		difference, and therefore should not be included within the Core Strategy as a “catch all” requirement for new housing developments within the Borough.		policy is flexible to ensure that these requirements can change over the plan period, based on monitoring of housing completions and newly emerging evidence.
General	B8.6 d)	It is necessary to ensure that any residential design standards within new housing developments imposed by the Council do not render it unviable. This aspect of viability has not been included within CS17, and it is vital that residential proposals are assessed on a site by site basis by the Council to ensure this is taken into consideration.	No	Noted. The mix of dwelling sizes is recognised as a “policy ask” in the overall assessment of plan-level economic viability undertaken by the Council. This is reflected in the final Core Strategy.

Policy CS18: Accommodation for Gypsies and Travellers and Travelling Show People

List of respondents

- Mr Steve Staines (ID: 370723) , Traveller Law Reform Project
- Christine Duffin (ID: 588372) , Homes and Communities Agency

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
General	B8.8 a)	Welcome is given to the emphasis on creating a balanced housing market, meeting needs and demands and increasing the delivery of housing at sustainable locations.	No	Noted and welcomed.
General	B8.8 b)	Broad support is given to the approach taken with broad criteria set against which to judge applications. This does give a measure of flexibility which is required given the difficulties experienced in finding sites which are suitable, affordable and available. It is trusted that the Council will take a measured and reasonable approach to enable needed sites to be developed on the ground.	No	Noted and welcomed. The Council will respond to the available evidence to take a “measured and reasonable” approach to the development of sites of the scale required and in the most suitable locations. This will be taken forwards within a subsequent site allocations document.
General	B8.8 c)	There is concern that despite the evidence base having been tested through an Examination in Public into the Regional Plan that the council is still equivocal about the need for the identification of a site or sites through an appropriate DPD. The Panel	No	The Council has recognised the Panel Report of the RSS Partial Review as one of several pieces of evidence available to inform its position on the need for the identification of sites

Policy CS18: Accommodation for Gypsies and Travellers and Travelling Show People

Accounting for Preferred Options Responses

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		<p>report of the Partial review of the NW Plan remains a material consideration even though in the long term RSSs will be revoked. There is sufficient information to hand at present to proceed with site identification as soon as possible. Failure to do so does inevitably mean further delay. This is inexcusable given the identified shortfall in both the district and region. Hence, any final policy developed should commit to meeting needs identified with a timetabled trajectory as for bricks and mortar housing.</p>		<p>within Knowsley. The Council intends to review this and other evidence, as noted in the policy, to determine the size of site required, and the most suitable location for the site. The limited demand for sites (as compared to general housing demand) means that the issue of site selection is non-strategic and therefore not suitable for further consideration within the Core Strategy. The Council's subsequent Local Plan documents will deal with this issue in more detail.</p>

Policy CS19: Design Quality and Accessibility in New Development

List of respondents

- Mr Jermaine Daniels (ID: 370866) , Merseyside Environmental Advisory Service (MEAS)
- Christine Duffin (ID: 588372) , Homes and Communities Agency
- Mr Carl Cashman (ID: 559304) , Knowsley Liberal Democrats - Kirkby Branch
- Mrs Judith Nelson (ID: 370871) , English Heritage - NW
- Mr Alan Hubbard (ID: 419883) , The National Trust
- Janet Bagueley (ID: 371683) , Natural England
- Rachel Bust (ID: 169659) , Coal Authority
- Peter Davis (ID: 587093)

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
General	B9.2 a)	Support is given to the strong approach to sustainable development strategic policy in more detailed policies, including CS19.	No	Noted and welcomed.
General	B9.2 b)	Support is given to policies which ensure that the historic built and natural environments are not compromised by future development and that the local distinctiveness of the areas is enhanced.	No	Noted and welcomed.
General	B9.2 c)	The approach is supported as providing the framework for the effective conservation, enhancement and enjoyment of the historic environment and its heritage assets. Particular support is given to the identification of locally important heritage assets.	No	Noted and welcomed.
General	B9.2 d)	CS19 makes reference to sustainable development, waste recycling, energy and resource efficiency,	No	Noted.

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		and the Code for Sustainable Homes and BREEAM, all of which provide a good link for the Waste DPD and related design policies.		
General	B9.2 e)	CS19 includes welcome recognition of the move to zero carbon development and sets specific references to Code for Sustainable Homes and BREEAM, which are linked through to more detailed options later. The reference to energy and resource efficiency is also welcome.	No	Noted.
General	B9.2 f)	This policy proposes a disproportional emphasis on the promotion of Knowsley at the expense of historic towns and villages in the borough.	No	The Council considers that the policy approach and the wider Core Strategy reflects a balance between the Borough wide focus on broad strategic objectives relating to issues affecting the whole of Knowsley, and the spatial priorities to meet the needs of Knowsley's individual communities and respects the distinctiveness of individual towns and villages.
General	B9.2 g)	Proposals to utilise Green Belt land at Whiston for new residential development will directly affect existing homes and is unacceptable. This is contrary to the supporting text within CS19.	No	The Council acknowledges concerns from local residents with regard to the release of Green Belt land in Whiston and as a consequence has ensured that the design of any proposal (following compliance with triggers in Policy CS 5) will be subject to a master planned approach which will need to accord with the design requirements of

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
				Policy CS 19. In this regard, the Council is content that in following this approach a scheme can be planned to mitigate the possibility of unacceptable impacts upon local residents.
General	B9.2 h)	The wording of CS19 could be improved, it could read “protect and where possible enhance...” It is also recommended that more could be said about biodiversity here.	Yes	The Council agrees that that the Core Strategy would benefit from specific reference to the need to accommodate surrounding biodiversity. Additional wording has therefore been provided in this regard. However the addition of ‘preserve and enhance’ relative to surrounding features, is considered unnecessary due to such an intervention being unachievable. This is noting that the majority of existing features that the design of development will be expected to respond, complement and integrate will remain outside of the planning unit and therefore specific interventions thereto will be beyond the control of the applicant / developer.
General	B9.2 i)	A new bullet point should be added to the third section of this policy which references “biodiversity enhancements, in line with the Liverpool City Region Ecological Framework.”	Yes	The Council agrees that that the Core Strategy would benefit from specific reference to the need to accommodate surrounding biodiversity. Additional wording has therefore been provided in

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				this regard. However reference to the Liverpool City Region Ecological Framework is considered too inflexible for the duration of the plan period and unnecessary repetition of the detailed focus of Policy CS 8.
General	B9.2 j)	The identities of Kirkby and Knowsley Village have been suppressed are not accurately reflected in this policy approach. For example, Knowsley is a village from which the borough takes its name and not an easily identifiable place as a result. In addition, Kirkby’s identity has been eroded by encouraging companies not to include Kirkby in postal addresses, failure to provide appropriate signage; removal of area names from postal addresses e.g. Northwood, Southdene, etc.	No	The Council considers that the policy approach and the wider Core Strategy reflects a balance between the Borough wide focus on broad strategic objectives relating to issues affecting the whole of Knowsley, and the spatial priorities to meet the needs of Knowsley’s individual communities and respects the distinctiveness of individual towns and villages.
General	B9.2 k)	Within the Knowsley area there are approximately 209 recorded mine entries and around 3 other recorded surface coal mining related hazards. Mine entries and mining legacy matters should be considered by the Local Planning Authority to ensure site allocations and other policies and programmes will not lead to future public safety hazards. Land instability and mining legacy is not a complete constraint on new development, but should be addressed to ensure that this is safe, stable and sustainable. At present the Core Strategy fails to address mining legacy that is	Yes (to Policy CS 2)	The Council agrees that the Core Strategy would benefit from specific reference to the need to address land instability / mining legacy; however this issue is more of an overarching consideration rather than a design element. Additional wording has therefore been provided in this regard in Policy CS 2.

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
		present within the area and it provides no policy to address the requirements of PPG14 in relation to unstable land. CS 19 should be amended as follows: <i>"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."</i>		

<p>Policy CS20: Managing the Borough's Heritage</p> <p>List of respondents</p> <ul style="list-style-type: none"> • Mr Jermaine Daniels (ID: 370866) , Merseyside Environmental Advisory Service (MEAS) • Christine Duffin (ID: 588372) , Homes and Communities Agency • Mrs Judith Nelson (ID: 370871) , English Heritage - NW • Mr Alan Hubbard (ID: 419883) , The National Trust 	
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Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
General	B9.4 a)	CS20 is supported as it provides the framework for the effective conservation, enhancement and enjoyment of the historic environment and its heritage assets. Particular support is also given to the identification of locally important heritage assets.	No	Noted and welcomed.
General	B9.4 b)	Support is given to policies which ensure that the historic built and natural environments are not compromised by future development and that the local distinctiveness of the areas is enhanced.	No	Noted and welcomed.
General	B9.4 c)	CS20 links well with the policies within the Waste DPD.	No	Noted.

Policy CS21: Urban Greenspaces	
List of respondents	
<ul style="list-style-type: none"> Mr Jermaine Daniels (ID: 370866) , Merseyside Environmental Advisory Service (MEAS) (ID: 588440) , Barratt Homes David Holmes (ID: 588375) Peter Davis (ID: 587093) Miss H M Flute (ID: 587138) 	<ul style="list-style-type: none"> Mr Carl Cashman (ID: 559304) , Knowsley Liberal Democrats - Kirkby Branch Mr Paul Daly (ID: 389928) , Sport England - NW Region Mr Alan Hubbard (ID: 419883) , The National Trust Janet Bagueley (ID: 371683) , Natural England

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
General	B9.6 a)	The proposal to build houses on Green Belt at Whiston is at odds with the policy approach in CS21 and therefore should be abandoned.	No	The Council considers the approach to Green Belt release in Whiston associated to Policy CS 5 has no conflict with Policy CS 21, as no part of the broad location is currently designated as urban greenspace. Furthermore the master plan approach to areas of Green Belt release is intended to ensure appropriate integration of development to local areas without causing significant harm to existing woodlands, water bodies and Local Wildlife Sites
General	B9.6 b)	Strong support is given to the content of CS21, but clear and full reference should also be made to Natural England's Accessible Natural Greenspace	No	The Council considers that the Natural England ANGSt standard remains unachievable due to significant

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		Standard (ANGSt). ANGSt is specifically aimed at towns and cities and would be ideal for adoption in Knowsley.		deficiencies in all Knowsley’s suburban areas and the existing urban density of many of these areas offering minimal opportunity for the provision of additional sites of the scale required. As a consequence the Council has chosen not to adopt standards for natural and semi natural spaces, but has included an approach that seeks to secure future retention of existing sites and appropriate enhancements, which aligns with and is supported by the broader principles of CS 8.
General	B9.6 c)	The objective of protecting greenspaces and setting standards is broadly supported. However, it is recommended that the bullet points which set out where development of greenspace would be resisted are amended. Specifically, the third bullet point which seeks to resist development which would result in the loss of a greenspace which is suitable to prevent or address deficiencies. However, there will be circumstances where a particular greenspace should be retained because of its value, even if its loss would not result in a quantitative deficiency.	Yes	The Council agrees that the Core Strategy would benefit from greater clarity in terms of restrictions relating to loss of greenspace with respect to a site’s individual quality and value. Amended wording has been provided to address this issue.
General	B9.6 d)	In terms of the proposed standards, the intention to calculate quantitative standards which would address needs of individual sports is welcomed.	No	The Council supports its policy approach in seeking to set standards to meet the needs of individual sports,

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		Any standards relating to outdoor pitches or pitch team sports should be based on an up to date playing pitch assessment / strategy which has been carried out in accordance with the methodology set out in Towards A Level Playing Field (the recommended methodology for producing playing pitch strategies).		as informed by an up to date Playing Pitch Assessment and Strategy that has recently been published.
General	B9.6 e)	There is some ambiguity relating to the securing of enhancements to greenspaces. The option states that 'enhancements' to green spaces would be secured through onsite provision or developer contributions. On site provision in my mind suggests that this would be provision of new greenspace as opposed to enhancement of existing greenspace. Support would be offered to a policy which allowed both for the provision of new and enhancement of existing greenspaces.	Yes	The Council confirms that the intention of the preferred option was to secure either on-site provision or off site improvements in accordance with greenspace standards. Wording changes have been provided to improve the clarity in this context.
General	B9.6 f)	There is a need for a flexible approach to be taken in implementing policies to protect Green Infrastructure to ensure that development is not hindered unnecessarily either where green infrastructure does not perform any valuable function or the benefit of redevelopment would outweigh the harm caused by the loss/part loss of green infrastructure. This flexibility is critical to ensuring the Core Strategy is able to deliver the growth the Borough needs in the most sustainable manner. CS21 confirms that, in considering	Yes	The Council agrees that the Core Strategy would benefit from greater clarity in terms of restrictions relating to loss of greenspace with respect to a site's individual quality and value. Amended wording has been provided to address this issue.

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		<p>proposals which would result in the loss of greenspace, these be resisted where the land in question is needed to avoid a deficiency in local provision as measured against established standards. This provides the flexibility needed as outlined above insofar as where no deficiency would result, proposals would not be automatically resisted. However, CS21 also confirms that proposals will be resisted where this would result in significant harm to existing or potential green infrastructure functions listed in CS8. This means the policy is slightly contradictory.</p>		
General	B9.6 g)	<p>There may be exceptional circumstances where, notwithstanding that the loss of an area of open space may result in the local area being deficient in provision; this loss would be acceptable when the benefits of the development are balanced against the negative effects of the loss of the open space. Where such circumstances exist, the restrictions imposed by CS21 should not prevent development from being permitted. It is recommended that the first part of CS21 should be amended to read as follows:</p> <ul style="list-style-type: none"> • “Significant harm of existing or potential Green infrastructure functions listed in the first four bullets of CS8. • A loss of greenspace suitable in terms of size, location or character to prevent or address 	Yes	<p>The Council supports its policy approach which provides sufficient flexibility for growth by not completely excluding development of greenspaces where required and appropriate, but instead ensuring suitable mitigation for any significant harm that may result. Amended wording has been provided to offer greater clarity in terms of restrictions relating to loss of greenspace with respect to a site’s individual quality and value. However the suggested addition of ‘<i>unless the benefits of the proposed development would outweigh the negative impact of the loss of the greenspace</i>’ is</p>

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		<p>individual deficiencies of different types of greenspace, without suitable mitigation being provided through replacement facilities of at least an equal quantity, quality and accessibility, unless the benefits of the proposed development would outweigh the negative impact of the loss of the greenspace...”</p> <p>The recommended amendment to bullet one and the exclusion of the fifth function of green infrastructure listed in CS8 ensures that this does not contradict bullet two which is specifically concerned with the fifth green infrastructure function listed in CS8.</p>		<p>discounted as it would create an unnecessary area of subjectivity and undermine the overall policy focus by implying that unmitigated harm to greenspaces would in some circumstances be acceptable.</p>
General	B9.6 h)	<p>The wording should be revised to state “retention of existing trees and woodland, vegetation and other habitat features which offer a positive contribution to the local environment...” Further revised wording should include: “appropriate planting of trees, other soft landscaping and installation of habitats features for the benefit of biodiversity”.</p>	Yes	<p>The Council agrees that the Core Strategy policy would be enhanced through the additional wording and changes have been made accordingly.</p>
General	B9.6 i)	<p>Halewood Triangle Park could be enhanced with the provision of additional planting, including sycamore trees and horse chestnut trees, which would be of benefit to local children and also to the local squirrel population, who are lacking food. In addition, the area would benefit from a new boating lake with an attendant and a camping area. The</p>	No	<p>Noted, the Council however supports the policy approach in seeking to preserve and enhance existing greenspaces. In this regard, the Core Strategy must remain strategic and therefore the site specific interventions and projects cannot reasonably be</p>

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		<p>existing sculptures are an eyesore and are not in keeping with the local environment or habitat. The Council's Open Spaces department have been reported over a badly polluted pond in woods that migrating birds frequent but this issue has still not been attended to four months later. Council staff have to answer for their responsibilities as park authorities and have to act according to the law.</p>		<p>specified or endorsed at this stage. Furthermore the actual management of spaces in Council ownership remains the responsibility of Neighbourhood Services rather than falling within the remit of planning control.</p>
General	B9.6 j)	<p>The area under consideration for new development at South Whiston is a haven for wildlife the movement of which is now curtailed by the urban boundaries and those of the M62 and M57/Knowsley Expressway. This wildlife is enjoyed by the whole community and has a huge diversity in fauna, insects and flora. As champion of the National Wildflower Centre it is unbelievable that Knowsley MBC would countenance the loss of such species diversity and the important role they play in the natural and agricultural landscape. Further development and loss of the Green Belt would ultimately result in further loss of wildlife habitats which are significant to the areas biodiversity. The contribution of Stadt Moers Country Park is acknowledged, however it does not provide the amount of space and natural and ancient environment for the diversity of wildlife within the whole of the South Whiston area. The remaining woodland, which is not included in the</p>	No	<p>The Council considers the approach to Green Belt release in Whiston associated to Policy CS 5 has no conflict with Policy CS 21, as no part of the broad location is currently designated as urban greenspace. Furthermore the master plan approach to areas of Green Belt release is intended to ensure appropriate integration of development to local areas without causing significant harm to existing woodlands, water bodies and Local Wildlife Sites</p>

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
		plans, would be severely impacted upon with overuse by the public, run off polluting water habitats and impacting negatively on air quality.		
General	B9.6 k)	The Council aims to improve the quantity, quality and accessibility of open spaces, including the 'green link'... but there will be no Green Belt to link to as there will be commercial sites on these linked spaces in Whiston and Cronton. A path along a disused railway line does not support the rich ecosystem of plants and animals that currently live in the Halsnead Park area.	No	The Council considers the approach to Green Belt release in Whiston associated to Policy CS5 has no conflict with policy CS21 or the strategic Green Infrastructure identified in policy CS8. The master plan approach to areas of Green Belt release is intended to ensure appropriate integration of development to local areas without causing significant harm to existing woodlands, water bodies and Local Wildlife Sites.

Policy CS22: Sustainable and Low Carbon Development

List of respondents

- Mr Jermaine Daniels (ID: 370866) , Merseyside Environmental Advisory Service (MEAS)
- Mr Graham Bee (ID: 397095) , Orbit Investments (Properties) Limited
- Victoria Murray (ID: 457367) , Redrow
- Mr Alan Hubbard (ID: 419883) , The National Trust
- Janet Bagueley (ID: 371683) , Natural England
- Mr Alasdair Cross (ID: 588381) , Halton Borough Council

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
General	B10.2 a)	The preferred option on Sustainable and Low Carbon Development is welcomed	No	Noted and welcomed
General	B10.2 b)	Welcome and support is offered to the strong approach to sustainable development within the document which is taken forward in more detailed policies including CS22.	No	Noted and welcomed
General	B10.2 c)	This policy is welcome and is supported given the importance of climate change, resource efficiency and energy security issues. The recognition of the energy hierarchy is particularly welcome, as is the reference to efficient use of water and mineral resources, as well as to flood risk and the use of SUDs.	No	Noted and welcomed
General	B10.2 d)	Support is given to the promotion of sustainable development and innovation in design and policies promoting zero carbon developments are	No	Noted and welcomed

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		welcomed. All new development should enable sustainable living that will set an example to other areas nationally and internationally. Development should be designed, built and laid out in ways which reduce reliance on the private car; use energy and water efficiently; minimise waste; and keep the carbon-footprint as low as possible.		
General	B10.2 e)	Encouragement is given to policies which include appropriate renewable energy targets and positive policies within DPDs to achieve local sustainability targets are welcomed. The inclusion of reference to higher levels of the Code for Sustainable Homes is welcomed. However any such references should seek to improve standards over those given as the minimum under Building Regulations.	No	Noted and welcomed. It is the intention of policy CS22 is encourage development to go beyond statutory Building Regulations which the Council will require new development to meet as a minimum. The prescribed levels of BREEAM and the Code are in line with the Government’s planned revisions to Building Regulations in 2013, 2016 and 2019.
General	B10.2 f)	Under the Priority Zones clause, the Council should consider whether the policy should accommodate the identification of future Priority Zones in the future and also the possibility to respond to windfall opportunities.	Yes	Noted and welcomed. Clarification will be added to the policy wording indicating that subject to opportunity and need, additional Priority Zones may be added in the future.
General	B10.2 g)	The carbon compensation fund is an interesting concept which may have implications for CIL or a future Allowable Solutions regime. This may require some elaboration and a link to be drawn to CS27 which covers developer contributions.	No	Noted. The development of CS 27, including new supporting evidence, has drawn together the range of developer contributions from across the Core Strategy, to look at these holistically in the light of evidence

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
				regarding economic viability of new development.
General	B10.2 h)	There is reference to new and/or revisions to existing SPDs, but it is questioned whether this is likely to proceed under the latest revisions to the planning regime, which seems to discourage their use.	No	The Council intends to continue to use SPDs to provide supplementary guidance to the strategic policies set within Local Plan documents. The form of these documents will be appropriate to their function and will work alongside a range of other documents within the Local Plan.
General	B10.2 i)	It should be made clear that every item within the list of sustainable construction principles is merely a set of guidelines to target rather than a list of set requirements that every new development should meet. At present, this proposal does not provide the flexibility required to impose this type of policy. Although it is accepted that the Government is moving towards a low carbon economy, sites should be assessed on a site by site basis to ensure the overall viability of the site is not at risk.	Yes	Noted and agreed. The Council appreciates the need to ensure the economic viability of development is maintained. Clarification has been added to the policy wording.
General	B10.2 j)	The plan period for this Core Strategy is to 2027, and new technologies may supersede this policy, thus providing/encouraging more efficient low carbon techniques in the future and rendering this policy out of date.	No	The Council is content with its policy position. It is considered that the principal elements of policy CS22 are sufficiently flexible to cater for technological changes during the plan period while also providing enough clarity for stakeholders.
General	B10.2 k)	Supporting text explains that energy from waste is	No	The Council is content with its policy

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		not highlighted as a potential solution for decentralised networks in the borough, or within the 'Primary Zone' in Knowsley Industrial and Business Park. Further clarity could be provided to set out that energy from waste does not include CHP for the purpose of this policy.		position. Further guidance regarding EfW facilities will be provided by the Joint Merseyside Waste Local Plan.
General	B10.2 l)	Under sustainable construction principles, the bullet which begins "Supplying energy efficiently..." is somewhat misleading and should instead read "Using energy efficiently..." as supply has generation and distribution implications which do not seem to be the subject of the clause, and a previous bullet has already referred to "Limiting energy use..."	No	The Council is content with its policy position. The intention of this element of the policy is to ensure that energy supplied to new development is done so in an efficient manner. This can be achieved by incorporating on-site or near site energy sources, where technically feasible or economically viable.
General	B10.2 m)	The approach gives Sustainable Construction Targets for residential and non-residential development. In particular, it identifies that developments should achieve BREEAM Very Good or Excellent after 2019. The need to include this policy is recognised, however it is not considered to have any flexibility and therefore would recommend that additional wording is added such as "subject to the viability and feasibility of provision".	Yes	Noted. Wording recognising that it may not always be technically feasible or economically viable to meet the targets within CS22 has been added to the policy.
General	B10.2 n)	CS22 introduces the concept of Priority Zones and Decentralised Energy Networks, but again there is no flexibility within the wording of the policy. It is important that the policy introduces a 'subject to	Yes	Noted. Wording recognising that it may not always be technically feasible or economically viable to meet the targets within CS22 has been added to the

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		viability and feasibility of provision' statement otherwise it could prevent much needed development from coming forward.		policy wording.
General	B10.2 o)	The fourth bullet of CS22 could usefully include waste. Mention of “sustainable waste behaviours” should be “sustainable waste practices”. Supporting text provides a useful link to the Waste DPD, but also rules out energy from waste. It therefore may be worth referring to small-scale energy from waste where this services a particular need, as this would link better with the Waste DPD.	Yes	<p>Noted and welcomed. The wording of policy CS22 has been updated in make referred to “sustainable waste practices”.</p> <p>Reference to EfW in the context of CS22 is in relation to energy networks. It is not considered that “small scale” facilities will be of a scale to warrant mention within this policy. The suitability of “small scale” facilities can be adequately addressed by the Joint Waste Local Plan.</p>

Policy CS23: Renewable and Low Carbon Infrastructure

List of respondents

- Mr Jermaine Daniels (ID: 370866) , Merseyside Environmental Advisory Service (MEAS)
- Nicholas Milner (ID: 588438) , Peel Holdings (Land and Property) Limited
- Mr Alan Hubbard (ID: 419883) , The National Trust
- Janet Bagueley (ID: 371683) , Natural England

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
General	B10.4 a)	Welcome and support is offered to the strong approach to sustainable development within the document which is taken forward in more detailed policies including CS23.	No	Noted and welcomed
General	B10.4 b)	CS23 is supported, though the text talks about proposals that produce energy. This should also explicitly support distribution infrastructure, which is a key component of decentralised energy systems.	Yes	Noted and welcomed. The policy wording has been updated to include proposals for the distribution of decentralised energy.
General	B10.4 c)	Reference to 'aviation safety' in respect of CS23 is welcomed. Reference should also be made to Department for Transport / Office of the Deputy Prime Minister Circular 1/2003 in respect of wider aerodrome safeguarding considerations in the plan making process.	No	The Council is content that the existing policy wording adequately addresses aviation issues. Specific reference to documents, such as Circular 1/2003, are likely to become outdated during the plan period.
General	B10.4 d)	While waste is not referred to specifically within the wording of CS23, the policy wording is broadly	No	Noted.

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
		compatible with the Waste DPD policies.		
General	B10.4 e)	Support is given to CS23, but the wording should be amended in the first paragraph to “provided that they do not cause harm...” rather than “significant harm”	No	The Council is content that the existing policy wording adequately addresses the harm that may be caused by renewable and low carbon developments.

Policy CS24: Managing Flood Risk

List of respondents

- Ms Dawn Hewitt (ID: 370989) , Environment Agency
- Mr Jermaine Daniels (ID: 370866) , Merseyside Environmental Advisory Service (MEAS)

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
General	B10.6 a)	This policy option complies with the requirement of national policy and recognizes the importance of addressing flooding issues early in the planning process, and is therefore welcomed and supported.	No	Noted
General	B10.6 b)	It is suggested that the approach is changed to remove the caveat of the requirement for SuDS due to ground contamination or conditions. It is felt that there are enough SuDS techniques to overcome these problems and this would be beneficial to the drainage of the catchment and relieving flooding hotspots highlighted by the Council considering recent pluvial events in the area, e.g. Huyton.	No	Noted. However the council supports its current policy approach. While there may be a range of SUDs techniques available, it will be important to ensure that they do not threaten the viability of a development.
General	B10.6 c)	It is recommended that the Council considers a Level 2 Strategic Flood Risk Assessment, to examine in more detail critical drainage areas and areas which could be within Flood Zone 3b (Functional Floodplain), as identified in CS24.	Yes	A 'Level 2' SFRA has now been undertaken to assess those sites which are proposed to be brought forward for new development up to 2028. Additional wording has been added to the supporting text to reflect this.

Policy CS25: Management of Mineral Resources

List of respondents

- Mr Jermaine Daniels (ID: 370866) , Merseyside Environmental Advisory Service (MEAS)
- Janet Bagueley (ID: 371683) , Natural England
- Rachel Bust (ID: 169659) , Coal Authority

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
General	B10.8 a)	Support is given to the preferred policy approach.	No	Noted and welcomed
General	B10.8 b)	With specific reference to Cronton Claypit, it would be advisable to discuss the feasibility of a Minerals Safeguarding Area designation with the owners of the site and also the Waste DPD team to ensure full compatibility with the owner’s plans and the Waste DPD.	Yes	The policy wording has been updated to highlight that MSAs will be identified within the Local Plan: Site Allocations and Development Polices and Proposals map without mentioning specific sites at this stage. It is agreed, that further discussion is required regarding Cronton Clay Pit prior to its identification and the policy also needs to be sufficiently flexible to cater for changing circumstances and additional evidence that may become available in the future.
General	B10.8 c)	While this approach is generally supported, it is recommended that additional flexibility be built in to the process of identification of Mineral Safeguarding Areas in the allocations DPD, as room needs to be	Yes	The policy wording has been updated to highlight that MSAs will be identified within the Local Plan: Site Allocations and Development Polices and

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		left to respond to emerging practice in this area. Such a restrictive MSA policy may not prove sustainable.		Proposals map without mentioning specific sites at this stage. It is agreed, that further discussion is required regarding Cronton Clay Pit prior to its identification and the policy also needs to be sufficiently flexible to cater for changing circumstances and additional evidence that may become available in the future.
	B10.8 d)	<p>The approach to mineral resources is considered fundamentally unsound. This is because the approach:</p> <ul style="list-style-type: none"> • Fails to reflect the requirements of MPS1 to safeguard minerals as far as possible • Fails to take account of the MPS1 Practice Guide and the BGS document 'A Guide to Mineral Safeguarding in England'. • Ignores the importance of safeguarding surface coal resources and avoiding their unnecessary sterilisation is set out in MPG3 and in the emerging Draft National Planning Framework. • Fails to address the potential for the prior extraction of minerals • Fails to account to Knowsley's potential contribution to energy security through its coal resources 	Yes	The policy wording has been updated to highlight that MSAs will be identified within the Local Plan: Site Allocations and Development Polices and Proposals map without mentioning specific sites at this stage. This allows the policy to remain sufficiently flexible to cater for changing circumstances and additional evidence that may become available in the future.
	B10.8 c)	The Minerals Safeguarding Area (MSA) for the surface coal resource should be amended to cover	Yes	The policy wording has been updated to highlight that MSAs will be identified

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		<p>the whole geological resource across the DPD area without exception. Alongside this there needs to be a policy focussed on promoting the prior extraction of mineral resources where non-mineral development is proposed in order to prevent the unnecessary sterilisation of resources. The Council has the opportunity to rectify this fundamental policy deficiency ahead of examination through the publication version. It should be noted that the Planning Inspectorate Guidance makes it explicit that it is necessary to identify MSAs on the Key Diagrams accompanying the Core Strategy with their precise boundaries then being delineated in a DPD such as a Site Allocations document.</p>		<p>within the Local Plan: Site Allocations and Development Polices and Proposals map without mentioning specific sites at this stage. This allows the policy to remain sufficiently flexible to cater for changing circumstances and additional evidence that may become available in the future.</p>
		<p>It is suggested that the following changes be made to policy wording to the second criterion of CS25: <i>“Mineral Safeguarding Areas in the general location of Cronton Clay Pit and for the surface coal resource are shown on the Key Diagram and will be identified in the Site Allocations and Development Policies DPD. Proposals for non-minerals development will be required to consider the potential for the prior extraction of the minerals and to demonstrate that the mineral resources in that area will not be sterilised in accordance with the criteria to be set in the Site Allocations and Development Policies DPD...”</i></p>	<p>Yes</p>	<p>The policy wording has been updated to highlight that MSAs will be identified within the Local Plan: Site Allocations and Development Polices and Proposals map without mentioning specific sites at this stage. This allows the policy to remain sufficiently flexible to cater for changing circumstances and additional evidence that may become available in the future.</p>

Policy CS26: Waste Management

List of respondents

- Mr Jermaine Daniels (ID: 370866) , Merseyside Environmental Advisory Service (MEAS)
- Janet Bagueley (ID: 371683) , Natural England

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
General	B10.10 a)	Support is given to the preferred policy approach.	No	Noted and welcomed.
General	B10.10 b)	The report takes account of the Waste DPD and most sections of the report were found to be broadly compatible with the Waste DPD vision, strategic objectives and development management policies.	No	Noted and welcomed.
General	B10.10 c)	CS26 represents an important inclusion, which is both compatible with the Waste DPD vision and strategic objectives, but also provides an essential link between these two Knowsley LDF documents. Certain paragraphs of supporting text will need to be updated prior to the subsequent stage of Core Strategy preparation, given progress with the preparation of the Waste DPD.	No	Noted. The supporting text for the Preferred Options document was current at the time of publication. The supporting text for this policy has subsequently been updated to reflect the latest stage of preparation of the Joint Merseyside Waste Local Plan.

Policy CS27: Planning for and Paying for New Infrastructure

List of respondents

- Mr Simon Clarke (ID: 588426) , Highways Agency
- Mr Jermaine Daniels (ID: 370866) , Merseyside Environmental Advisory Service (MEAS)
- Ms Dawn Hewitt (ID: 370989) , Environment Agency
- Mr Graham Bee (ID: 397095) , Orbit Investments (Properties) Limited
- Victoria Murray (ID: 457367) , Redrow
- Mr Neil Scales (ID: 588428) , Merseytravel
- Diane Clarke (ID: 588337) , Network Rail
- Laura Jenkinson (ID: 588334) , Knowsley MBC Multi Faith and Belief Group
- Mr Paul Daly (ID: 389928) , Sport England - NW Region
- Rose Freeman (ID: 400832) , The Theatres Trust

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made <i>(yes/no)</i>	Additional Council comments <i>(rationale behind why policy was changed)</i>
General	B11.2 a)	The inclusion of culture in this policy is welcomed. The preferred approach is sensible as it recognises that it is more sustainable to improve existing infrastructure than build new.	No	Noted and welcomed.
General	B11.2 b)	Whilst the final mechanism has yet to be identified, the principle of securing infrastructure and / or contributions to pay for infrastructure which includes indoor and outdoor sport facilities is supported.	No	Noted and welcomed.
General	B11.2 c)	Lottery funding is available for local authorities to bid for funds to protect and improve playing fields. A robust and up-to-date playing pitch assessment is required to support bids.	No	Noted and welcomed. The Council recognises the importance of having an up-to-date playing pitch assessment in place.
General	B11.2 d)	Waste is not explicitly mentioned, except in the table outlining infrastructure categories, although waste is an essential element of any community. It	Yes	Planning for Waste infrastructure in Knowsley, along with the other areas of the Liverpool City Region, is dealt

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		is implicit that the policies and text are compatible with the Waste DPD.		with within the Joint Waste Local Plan. Clear policy links have been added to clarify this.
General	B11.2 e)	The ongoing support of the Council for the rail electrification project is welcomed.	No	Noted and welcomed.
General	B11.2 f)	Opportunity to comment on further revised and updated versions of the Infrastructure Delivery Plan would be welcomed at the appropriate stage. In addition, a dialogue in relation to matters of detail on developer contributions in providing an effective mechanism for supporting any infrastructure improvements on the strategic highway network would be welcomed.	No	Noted and welcomed. A revised and more detailed Infrastructure Delivery Plan has been made available in support of the Core Strategy.
General	B11.2 g)	Support is given to the Council's confirmation that due regard will be given to the potential impacts of developer contributions for infrastructure provision, and other policy requirements on the economic viability of new development. Any contributions requested by the Council in relation to new development must ensure this is adhered to.	No	Noted.
General	B11.2 h)	Any developer contributions arising as a direct result of any new development must be compliant with National and Development Plan policy and future CIL requirements.	No	Noted and welcomed.
General	B11.2 i)	It is critical that infrastructure is in place to deliver the Plan, in particular it is critical that adequate public transport infrastructure is in place, minimising unnecessary travel by non-sustainable means. It is	No	Noted. The Council recognises the importance of adequate infrastructure planning to support new development.

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		also important to ensure there are sufficient high quality educational, social and leisure facilities.		
General	B11.2 j)	The approach should include Local Wildlife Sites within the open space category.	Yes	Local Wildlife Sites have been added to the “open spaces” section of the infrastructure categories table. It should be noted that these are specifically designated rather than general infrastructure provision, like other open spaces.
General	B11.2 k)	Within the infrastructure categories defined, the open space section should also include “important wildlife habitats”. The term “green public realm” is repeated twice in this section.	Yes	Noted. As above, wildlife habitats or Local Wildlife Sites will be added to the list.
General	B11.2 l)	Infrastructure categories should also be revised to include the category “water-bodies” with sub-categories including “rivers, streams, ditches, ponds, lakes, canals and reservoirs”.	Yes	Additional category added.
General	B11.2 m)	When the expansion of housing is being considered, or discussions around the suitability of settlement site for travellers, to what extent is access to religious establishments/ places of worship, and access to children’s centres considered?	No	Places of worship are included as one of the sub-categories of community infrastructure, while children’s centres are included as a sub-category of children’s services. These are to be considered alongside other forms of infrastructure on the Core Strategy and its supporting Infrastructure Delivery Plan.
General	B11.2 n)	Regarding transport infrastructure, the following issues are noted:	No	The issues raised in relation to transport infrastructure are noted.

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		<ul style="list-style-type: none"> • Buses are more flexible but this comes at a cost. The cost of accommodating changes to the bus network should be mitigated by locating developments close to existing routes, detail design issues to make it easy to route bus services directly through development and finally high quality design is important. • The Council should refer to existing best practice and the Institution of Highways & Transportation (IHT) "Guidelines for Planning for Public Transport in Developments". • There are six bus stations across Merseyside, including one at Huyton within Knowsley, which are major assets and key hubs in the bus network. • The taxi sector can make an important contribution to improving accessibility to key opportunities and services in particular for disadvantaged groups and areas. There is scope for improved management of taxi ranks including measures such as raised access kerbs or bays to allow safe loading of the less mobile into taxis. 		<p>Buses, bus stations and taxis are all specifically mentioned as sub-categories of transport infrastructure and referenced in the Infrastructure Delivery Plan. The reference to best practice is also noted – a cross-reference to this will be included in the Infrastructure Delivery Plan.</p>
General	B11.2 o)	<p>In the Infrastructure Delivery Plan and as consideration starts to be given to Community Infrastructure Levy issues, consideration should be given to including the following transport measures, as well as smarter choices measures, if possible:</p>	No	<p>No changes for the Core Strategy, but the additional suggestions for inclusion within the Infrastructure Delivery Plan are noted and welcomed. In particular, it is useful to note local priorities for the</p>

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		<ul style="list-style-type: none"> • Welcome would be given to a statement of support for the Merseyside & Halton Freight Quality Partnership and the Merseyside Taxi Quality Partnership • Improving partnership working with Knowsley Council in regard to improving management of coaches (both scheduled and tourist) to ensure adequate layover infrastructure is provided. • The improved management of taxi ranks including measures such as raised access kerbs or bays to allow safe loading of the less mobile into taxis. This will help ensure a high quality customer experience for those using taxis. • Capitalising on opportunities arising from the Northern Hub project which will help relieve the bottlenecks on the rail network in the Manchester area and open up new journey opportunities across Northern England. • Further rail electrification in the future such as the North Transpennine Line (Manchester-Leeds-York), Cheshire Lines Route (Liverpool to Manchester via Warrington), Crewe to Chester, Manchester to Bolton, Wigan and Southport. • In the run up to High Speed 2 being implemented, further development of rail services on the West Coast Main Line to increase frequencies on the Liverpool to London route via additional services and create new 		<p>improvement of small-scale transport infrastructure. Some of these elements (e.g. electrification of rail, Northern Hub project) have already been noted as key strategic infrastructure investment priorities.</p>

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made (yes/no)	Additional Council comments (rationale behind why policy was changed)
		<p>journey opportunities such as direct train services from Liverpool to Scotland (e.g. Glasgow and Edinburgh) and from Liverpool to the South Coast and South West</p> <ul style="list-style-type: none"> • Provision of level, step free access infrastructure such as lifts and ramps to enable access for all at many railway stations in Merseyside • Possible future provision of station travel plans, which will seek to manage patronage growth, minimise the negative impacts on communities caused by rail stations, improve ticketing and information, embrace the full range of sustainable modes of travel and bring together the full range of stakeholders. 		
General	B11.2 p)	<p>It would be helpful to encourage faster and better broadband coverage to homes and businesses as this will help reduce the need to travel, enable further development of alternatives to travel such as home working and video conferencing etc. This includes greater coverage of Wi-Fi across the city region and further afield. This digital infrastructure is also especially important for emerging Real Time Information Strategies for transport which is likely to involve linking with Wi-Fi and internet, including the provision of real time customer information screens (CIS)</p>	No	<p>The supporting text for policy CS27, including the list of infrastructure categories, as well as the Infrastructure Delivery Plan, recognises the role of digital infrastructure in supporting communities. Within the IDP, the link between installation of digital infrastructure and reducing the need to travel has been emphasised. The link for transport information has also been mentioned in the IDP.</p>
General	B11.2 q)	<p>Support is given for new transport buildings to achieve a BREEAM "Very Good" rating or</p>	No	<p>Noted. The Council has already considered these measures within its</p>

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		equivalent CEEQUAL rating. Other green infrastructure measures to consider could include infrastructure related to climate change adaptation such as tree planting to shade car parks/road surfaces, sustainable urban drainage, resurfacing, bridge maintenance, etc. and wildflower planting along transport corridors to improve biodiversity.		policies on Green Infrastructure and urban greenspaces, as well as within the definition of Green Infrastructure within the IDP.

Summary Leaflet

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made?	Council Comments / Response
Overall thoughts – support	A2.2 a)	Over 60 responses to this question expressed general support for the proposals outlined within the leaflet.	No	Noted.
Overall thoughts – support	A2.2 b)	Aspects of the proposals which were particularly supported included: <ul style="list-style-type: none"> • Regeneration of Kirkby town centre • Provision of new houses including affordable housing 	No	Noted. These proposals are included in policies CS10 and CS15.
Overall thoughts – objection	A2.3 a)	Over 120 responses to this question expressed objections to the proposals set out in this leaflet	No	Noted.
Overall thoughts - objection	A2.3 b)	Aspects of the proposals which were particularly objected to included: <ul style="list-style-type: none"> • Proposed use of Green Belt land for housing / employment development, particularly in Whiston, Halewood and Huyton • The lack of progress with retail-led regeneration at Raven Court centre in Halewood • The current position of Prescot Town Centre 	No	Noted. The objection to the proposed use of Green Belt was widely voiced. However, the Council considers it necessary to continue with this policy approach in order that housing and employment needs can be met over the plan period and that the Council produces a sound plan for Knowsley. The Council remains committed to the regeneration of Halewood district centre (Raven Court), as indicated in the Core Strategy, and as demonstrated by work continuing on site. The Council is also aware of issues with Prescot Town Centre, as

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made?	Council Comments / Response
				set out within the Core Strategy and its supporting materials. These are addressed within Policy CS14.
Overall thoughts - Scepticism / confusion	A2.4 a)	Nearly 30 responses expressed scepticism about the proposals, and whether these could ever be delivered within Knowsley	No	Noted. Deliverability is a key element within the Core Strategy, and the Council is obliged to ensure that policy actions are deliverable over the plan period. This has to be balanced with efforts to meet the vision and objectives within the Core Strategy and to plan positively for the future.
Overall thoughts - Scepticism / confusion	A2.4 b)	A substantial number of respondents also expressed scepticism about the value of the consultation exercise, stating that they did not believe this represented a valuable exercise	No	Noted. The Council has a statutory obligation to account for and respond to the responses received through the consultation period (including the Preferred Options consultation). In addition, the Council's consultation methods are in accordance with its adopted Statement of Community Involvement.
Overall thoughts - Scepticism / confusion	A2.4 c)	Over 15 responses expressed confusion or a lack of understanding about the proposals and also questioned whether the level of detail set out within the leaflet was appropriate for the purposes of consultation	No	Noted. The Council recognises that the summary leaflet contained a limited version of the full Preferred Options Report and therefore was lacking in detail. It would not have been practical or cost effective to share the same quantity of a more detailed version with residents and partners. However, as stated in the leaflet and elsewhere in

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				publicity materials, the full Report and its supporting materials were available online and as paper copies in deposit locations around the Borough. The Council believes that through the leaflet, the correct balance was struck regarding the level of information available.
Non-planning issues	A2.5 a)	<p>Many respondents mentioned issues that were not directly relevant to the proposals set out within the leaflet. Popular issues included:</p> <ul style="list-style-type: none"> • Litter and the urban environment • Anti-social behaviour • Congestion and public transport services • The Council’s leisure strategy and previous decisions made about the location of leisure centres • A perceived monopoly of the retail market by some retailers 	No	It is noted that these issues are of concern to residents. However, these are service level issues (e.g. litter, ASB), previously made decisions (e.g. relating to leisure centres) or issues that the Council cannot control (e.g. a preceived prevalence of certain retailers). It is therefore not within the scope of the Core Strategy to address these issues.
Huyton and Stockbridge Village – Liked about plans	A4.1 a)	(liked) Recognition of local history and character	Yes	Noted. This is carried forward in Policy CS20. Increased emphasis has been added to the policy to focus on local heritage assets.
Huyton and Stockbridge Village – Liked about plans	A4.1 b)	(liked) Construction and completion of the new Leisure and Culture Park	No	Noted. This important infrastructure project has now been completed.

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Kirkby – Liked about plans	A4.2 a)	(liked) That the plans may bring jobs for young people and currently unemployed in Kirkby	No	Noted. The aim of boosting employment levels and providing job opportunities for local people is a central aim of the Core Strategy.
Kirkby – Liked about plans	A4.2 b)	(liked) Planned retail-led regeneration in Kirkby Town Centre	No	Noted. This is supported by an approved planning application, as well as within policies CS6 and CS10.
Kirkby – Liked about plans	A4.2 c)	(liked) Potential positive impact of drawing more families into the town due to improved residential offer, facilities and infrastructure	No	Noted. The plan aims to make Knowsley, including Kirkby, a sustainable and attractive place for families to live, both for existing residents and for new residents.
Kirkby – Liked about plans	A4.2 d)	(liked) Protection of Valley Road Corridor	No	Noted. The Valley Road Corridor is part of the strategic green link identified through the town of Kirkby as part of Policy CS8.
Prescot, Whiston, Cronton and Knowsley Village – Liked about plans	A4.3 a)	(liked) Capitalising on Prescot’s historic legacy and regenerating the town centre, including provision of better links to Cables retail park	No	Noted. Policies CS14 and CS20 seek to support this, through recognising the specific heritage value of Prescot, and the need to link the older centre around Eccleston Street to the newer retail facilities at Cables retail park.
Prescot, Whiston, Cronton and Knowsley Village – Liked about	A4.3 b)	(liked) Protecting and enhancing character of rural villages including Knowsley and Cronton	No	Noted. This policy approach remains central to the spatial strategy, and is also upheld through policy CS20, which seeks to manage the Borough’s heritage assets.

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plans				
Prescot, Whiston, Cronton and Knowsley Village – Liked about plans	A4.3 c)	(liked) Provision of affordable housing options, particularly within areas which currently attract anti-social behaviour	No	Noted. The need to provide affordable housing has been clearly identified within the Council’s evidence base, and is carried forward a as an important policy in CS15.
Prescot, Whiston, Cronton and Knowsley Village – Liked about plans	A4.3 d)	(liked) Possibility of new jobs and businesses locating in the area	No	Noted. Encouraging business investment in this township area is included within the Core Strategy, including in policies relating to South Prescot and Prescot Town Centre.
Prescot, Whiston, Cronton and Knowsley Village – Liked about plans	A4.3 e)	(liked) Improving the quality of greenspaces around Whiston	No	Noted. Borough-wide greenspaces will be subject to the improvements outlined in policies CS8 and CS21.
Halewood – liked about plans	A4.4 a)	(liked) Delivering planned retail-led regeneration in Raven Court	No	Noted. The Council remains committed to this consented scheme, which is expected to be completed by the end of 2012.
Halewood – liked about plans	A4.4 b)	(liked) Improving quality and accessibility of green and open spaces, including Halewood triangle	No	Noted. Borough-wide greenspaces will be subject to the improvements outlined in policies CS8 and CS21.

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				Halewood Triangle is identified as part of a strategic green link through the area in policy CS8.
Halewood – liked about plans	A4.4 c)	(liked) Recognition of the need for new jobs and housing, including affordable housing	No	Noted. The aims and objectives of the Core Strategy include the delivery of new jobs throughout the Borough, as well as a rebalancing of the housing market and a provision of additional affordable housing units.
Halewood – liked about plans	A4.4 d)	(liked) Opportunity to enhance connections between Halewood and Liverpool, including employment	Yes	Noted. The Council recognises through the Core Strategy that Halewood is located in close proximity to strategic employment areas in Liverpool. This is emphasised through the Council’s evidence base and also the approach to employment development set out in CS4.
Halewood – liked about plans	A4.4 e)	(liked) Focus on development of existing vacant brownfield sites e.g. Bridgefield Forum	No	Noted. There remains a commitment to the development of brownfield land within the urban area. Bridgefield forum is an allocated housing site within the Unitary Development Plan and its allocation for housing will remain under the Core Strategy policies.
Huyton and Stockbridge Village – disliked about plans	A5.1 a)	(disliked) Utilisation of land at Edenhurst Avenue and Knowsley Lane for new residential development, including concerns about traffic and environmental impacts, flood risk, community safety and impacts on houses prices	No	Locations within the Green Belt at Edenhurst Avenue and Knowsley Lane were chosen for future development in response to the evidence collected by the Council about the suitability of

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				Green Belt sites to accommodate new housing and employment. Detailed concerns about the development of these locations will be addressed by the Council through the planning application process.
Huyton and Stockbridge Village – disliked about plans	A5.1 b)	(disliked) Overlooking of the Bluebell Estate and the Roby areas within plans and proposals	No	Noted. The Core Strategy considers strategic development opportunities within the Borough, and hence these areas have not been specifically identified with individual policies. However, the Core Strategy contains blanket policies which cover all areas of the Borough, and seek to address issues like rebalancing the housing market and environmental improvements. In addition, subsequent plans within the Local Plan will include site allocations for local areas not addressed in the Core Strategy.
Huyton and Stockbridge Village – disliked about plans	A5.1 c)	(disliked) Lack of replacement of “Heatwaves” centre in Stockbridge Village and poor facilities for youth recreation	No	Decisions regarding the Council’s investment in leisure facilities in Stockbridge Village have been decided in advance of the Core Strategy. It is noted that poor facilities for youth recreation in this area is perceived to be an ongoing problem.
Huyton and Stockbridge	A5.1 d)	(disliked) Lack of plans for new shops and existing range of shops / facilities and vacancy in the town	No	Noted. The Core Strategy does not plan significant additional retail growth

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Village – disliked about plans		centre		within Huyton or Stockbridge Village. Issues with diversifying the range of retail and other facilities within the town centres are dealt with under policy CS6, including addressing vacancy, to support more vibrant town centres.
Huyton and Stockbridge Village – disliked about plans	A5.1 e)	(disliked) Poor existing transport links for Huyton and Roby	No	Huyton and Roby benefit from rail, bus and road links to Liverpool City Centre, and to other centres such as Prescot, St.Helens and Manchester. Huyton and Roby will also benefit from the electrification of the rail line between Liverpool and Manchester. This and other transport network policies are set out in CS7.
Huyton and Stockbridge Village – disliked about plans	A5.1 f)	(disliked) The car parking charging scheme in Huyton town centre	No	Noted. Decisions regarding car parking charges are made outside of the Core Strategy process.
Huyton and Stockbridge Village – disliked about plans	A5.1 g)	(disliked) Apparent mismatch between residential regeneration and infrastructure provision e.g. in North Huyton	No	Noted. The Council is seeking to match new development with adequate supporting infrastructure, including at the plan level through the Infrastructure Delivery Plan process and as planning applications are considered by the Council.
Kirkby – disliked	A5.2 a)	(disliked) Utilisation of land at Bank Lane, Kirkby for new residential development, including concerns	No	The location within the Green Belt at Bank Lane was chosen for future

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about plans		about damage to local amenity, traffic increases and environmental impacts		development in response to the evidence collected by the Council about the suitability of Green Belt sites to accommodate new housing and employment. Concerns about the development of this location will be addressed by the Council through the planning application process.
Kirkby – disliked about plans	A5.2 b)	(disliked) Residential development should be private market housing, not social housing	No	The Council identified through its evidence base the need to rebalance the housing market in Knowsley, which included the construction of both market and affordable (social rented and intermediate) housing types. This approach is reflected in policy CS15.
Kirkby – disliked about plans	A5.2 c)	(disliked) New retail development in Kirkby town centre could undermine the existing shops and facilities	No	Noted. The redevelopment of Kirkby town centre is subject to a granted planning permission. The approach is a comprehensive one which serves to regenerate the whole town centre with a range of interventions. The Council believes that this approach will benefit the town centre as a whole, improving its vitality and viability, while addressing the established retail needs of the town.
Kirkby – disliked about plans	A5.2 d)	(disliked) Lack of good public transport links to Liverpool and other areas	No	Noted. Kirkby does benefit from rail and bus links to Liverpool and other areas; however the Council does

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				recognise that these could be improved in the Core Strategy. The Council continues to lend its support to the stalled Merseytram scheme which would connect Liverpool City Centre to Kirkby town centre. In addition, the Council works collaboratively with Merseytravel on transport planning matters including through the Local Transport Plan.
Kirkby – disliked about plans	A5.2 e)	(disliked) Lack of schemes to encourage reinvestment in employment areas or public transport facilities to service these areas	No	The Council would counter that investment in Kirkby’s employment areas is a high priority, particularly when considering the Knowsley Industrial Park Review and the implementation of its recommendations through policy CS22 and other policies. The measures outlined for KIP and the nearby Knowsley Business Park include road and public realm enhancements.
Kirkby – disliked about plans	A5.2 f)	(disliked) Potential loss of open and green spaces for new development	No	Noted. Sources of existing green and open space have been considered as potential provision of development land. However, the Council has also assembled evidence regarding which areas are currently in surplus and deficit of different kinds of open space. A balanced judgement has been made

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				between the value of green and open space to communities, and the benefits that new development and investment would bring. This is set out in policies CS8 and CS21.
Kirkby – disliked about plans	A5.2 g)	(disliked) Lack of detail about funding proposals for long term regeneration of employment areas	No	Delivery of long term regeneration in employment areas requires a combination of private and public investment relative to prevailing economic circumstances during the plan period. As the Core Strategy is strategic in nature, the detailed design and land uses in regeneration areas is not fixed at a site specific level, therefore funding sources and estimated values are subject to change meaning prescriptive details are not appropriate. The Council's evidence does however include indicative costing for infrastructure requirements where necessary to facilitate structural remodelling and secure development investment in these areas.
Kirkby – disliked about plans	A5.2 h)	(disliked) Lack of proposals for new and improved sports and leisure facilities e.g. sports arena, ice rink, cinema	No	Decisions regarding the Council's investment in leisure centres and sports facilities around Knowsley have been made in advance of the Core Strategy and therefore are outside of the scope of planning policy.

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				Development in town centres, including leisure uses such as those mentioned, is covered by policies CS4 and CS6, as well as those relating specifically to Kirkby and Prescott town centre regeneration.
Prescot, Whiston, Cronton and Knowsley Village – disliked about plans	A5.3 a)	(disliked) Utilisation of land at Knowsley Village for new residential development, including concerns that this may undermine the “village” atmosphere	No	Noted. The location within the Green Belt at Knowsley Village is reserved for longer term use. This location was chosen for future development in response to the evidence collected by the Council about the suitability of Green Belt sites to accommodate new housing and employment. Concerns about the development of the location will be addressed by the Council through the planning application process.
Prescot, Whiston, Cronton and Knowsley Village – disliked about plans	A5.3 b)	(disliked) Utilisation of land to the south of Whiston for new residential development, including concerns about potential impacts on traffic levels and the loss of environmental amenity, important habitats for flora and fauna and functional farm land	No	Noted. The location within the Green Belt to the South of Whiston has been chosen for future development in response to the evidence collected by the Council about the suitability of Green Belt sites to accommodate new housing and employment. Concerns about the development of this location will be addressed by the Council through the planning application process.

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Prescot, Whiston, Cronton and Knowsley Village – disliked about plans	A5.3 c)	(disliked) Utilisation of land at Cronton Colliery for employment uses including concerns that this should be left for nature conservation. Question whether brownfield sites should be used instead	No	Noted. The location within the Green Belt at Cronton Colliery is reserved for longer term use. This location was chosen for future development in response to the evidence collected by the Council about the suitability of Green Belt sites to accommodate new employment development. Concerns about the development of the location will be addressed by the Council through the planning application process. It should be noted that although within the Green Belt, Cronton Colliery is actually a brownfield (previously developed site). The proposed use of this site for longer term employment uses is complemented by the promotion of existing available employment sites within the urban area of Knowsley, as set out in CS4.
Prescot, Whiston, Cronton and Knowsley Village – disliked about plans	A5.3 d)	(disliked) Apparent turnaround of 1995 decision to keep land to the South of Whiston within the Green Belt	No	Noted. The Council has to plan for development of the Borough up to 2028. The location within the Green Belt to the South of Whiston has been chosen for future development in response to the evidence collected by the Council about the suitability of Green Belt sites to accommodate new

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				housing and employment. Concerns about the development of this location will be addressed by the Council through the planning application process.
Prescot, Whiston, Cronton and Knowsley Village – disliked about plans	A5.3 e)	(disliked) That any new development at Halsnead area should include employment development to limit the number and length of journeys for local people	No	Noted. It is the Council’s intention that land to the South of the M62 at Cronton Colliery will be used in the longer term for employment use. There are also neighbouring employment locations at Huyton Business Park, and in South Liverpool, as well as opportunities presented by the excellent motorway links from the location. The development of this location presents opportunities for improved public transport links. This means that the area at Halsnead Park, which is reserved for residential development under policy CS5, will be well served by local employment opportunities.
Prescot, Whiston, Cronton and Knowsley Village – disliked about plans	A5.3 f)	(disliked) Lack of visible progress with footpath links from Whiston to Cronton	No	Noted. The Council acknowledges improvements to footpath links between Whiston and Cronton is strategically important and anticipated delivery is supported by identification as a strategic green link within the Key Diagram and within the area priorities.
Prescot,	A5.3 g)	(disliked) Lack of detailed focus on regeneration of	No	The full Preferred Options Report

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Whiston, Cronton and Knowsley Village – disliked about plans		Prescot Town Centre, including tackling town centre vacancy / unsuitable shops and dealing with the negative impact of Cables retail park on the town centre		included a detailed focus on this area, which was lacking within the Summary Leaflet. Among the priorities identified are to tackle town centre vacancy and to better link the older part of the town centre (i.e. Ecclestone Street) with the newer part at Cables retail park. This approach is continued in Policy CS14.
Prescot, Whiston, Cronton and Knowsley Village – disliked about plans	A5.3 h)	(disliked) Lack of recognition of the impact of car parking charges on the viability of town centre regeneration	No	Noted. Decisions regarding parking charges in town centres have been made outside of the Core Strategy preparation process. These have been made across all town centres, and are in accordance with parking charges in nearby districts. Different elements of conditions that affect town centre viability are being monitored by the Council to assess their impacts.
Prescot, Whiston, Cronton and Knowsley Village – disliked about plans	A5.3 i)	(disliked) Lack of plans for new / replacement leisure facilities within Prescot and the need for new community infrastructure	No	Decisions regarding the Council’s investment in leisure centres and sports facilities around Knowsley have been made in advance of the Core Strategy and therefore are outside of the scope of planning policy. However, the wider scope of community infrastructure is considered as part of the Council’s infrastructure planning and also as part of policy CS27.
Prescot,	A5.3 j)	(disliked) Lack of plans for regeneration in Whiston	No	Noted. Whiston is not one of the

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made?	Council Comments / Response
Whiston, Cronton and Knowsley Village – disliked about plans				Principal Regeneration Areas identified in the Core Strategy, as in comparison to other areas of the Borough, there is little evidence that this area is in need of regeneration. However, the Core Strategy contains a number of Borough-wide policies to guide any development proposals outside of these specific regeneration areas.
Prescot, Whiston, Cronton and Knowsley Village – disliked about plans	A5.3 k)	(disliked) Lack of recognition of the unique character of the constituent parts of the area, and disagreement with grouping together areas under one title	No	The Prescot, Whiston, Cronton and Knowsley Village area is representative of one of the Area Partnership Boards (APBs) which cover Knowsley. Whilst it is recognised that this area is diverse in nature, there are also similarities between the settlements, including their historic character. These values are recognised by the Council through the Core Strategy policies which relate to this area.
Prescot, Whiston, Cronton and Knowsley Village – disliked about plans	A5.3 l)	(disliked) Questionable need for new houses when there are problems with selling empty houses in the existing market	No	Noted. The Council recognises that there are homes which are empty within Knowsley. Some of these are empty to allow for turnover (e.g. houses awaiting sale), which is a sign of a healthy housing market. Some others have been on the market for a long time, reflecting the impacts of the economic recession on the housing

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				market. Others still are long-term vacant, for a variety of reasons. However, Knowsley does not have a level of empty homes that is significantly higher than what would be expected under normal market conditions. Therefore the Council does not consider this a major issue when planning for longer term housing growth.
Halewood – disliked about plans	A5.4 a)	(disliked) Utilisation of land to the east of Halewood for new residential development, including impacts of enlargement of the settlement	No	Noted. The location within the Green Belt to the east of Halewood was chosen for future development in response to the evidence collected by the Council about the suitability of Green Belt sites to accommodate new development. It is recognised that the development of the location would enlarge the settlement at Halewood, however this would enable the Council to meet its long term housing needs and would be supported by relevant infrastructure. Other concerns about the development of the location will be addressed by the Council through the planning application process.
Halewood – disliked about plans	A5.4 b)	(disliked) Lack of information about the type / tenure / access to any new residential area to the east of Halewood	No	Noted. The Council has not provided any details of the potential housing developments that would be located to

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				the east of Halewood. This is because the Core Strategy identifies broad locations for Green Belt development only. The feasibility of access to such locations is provided within the Council's transportation evidence, while broad indications of the types, tenures and sizes of housing the Council is seeking to provide during the plan period can be found in the Core Strategy's housing policies, including CS15 and CS17.
Halewood – disliked about plans	A5.4 c)	(disliked) Questionable whether new houses built in Halewood would be attractive and would sell given existing housing market	No	Noted. The Council has had regard to current market conditions, but also needs to recognise that the Core Strategy covers an extended period to 2028, during which the housing market is likely to fluctuate several times. The Council understands that there is landowner and developer support for the inclusion of Green Belt land at Halewood in the housing supply.
Halewood – disliked about plans	A5.4 d)	(disliked) Concern that additional “private” housing schemes would be poorly integrated into the community	No	Noted. The Core Strategy's housing policies seek to move away from poorly integrated private housing towards balanced and sustainable neighbourhoods, which feature a range of housing types, tenures and sizes.
Halewood –	A5.4 e)	(disliked) All existing greenspaces should be left for	No	Whilst the value of green and open

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disliked about plans		use for agriculture and wildlife and not be used for new development		spaces is recognised, the Council does not believe that this is a sustainable position if targets for housing and employment growth are to be met. The Council will continue to seek to ensure that negative impacts on wildlife and agriculture are minimised. The Council has followed due process with regard to environmental and habitats appraisals through its plan preparation process, in addition to locally collated evidence regarding the value of existing open spaces.
Halewood – disliked about plans	A5.4 f)	(disliked) Potential negative impact on flooding and local flood plain caused by new development	No	Noted. The Council recognises that there are areas of Knowsley which are subject to different levels of flood risk and has collected an extensive evidence base in this regard. The Council does not believe that the policies of the Core Strategy will necessarily exacerbate these flood risk issues, and that mitigation measures can be taken to ensure that new development is not at risk of flooding, and does not place adjacent areas at similar risk. This position is supported by the policy measures outlined in CS24.
Halewood –	A5.4 g)	(disliked) Potential negative impacts of new	No	Noted. The Council is planning for both

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disliked about plans		residential communities taking jobs in local industry away from local people		employment and housing growth within the Core Strategy, meaning that both homes and jobs will be provided over the plan period. However, it should be noted that Knowsley is located within a dynamic city region which is densely urbanised and with significant commuting patterns, for example with Liverpool City Centre. Where possible, the Council will seek to monitor trends of live-work areas and introduce measures to secure jobs for local people.
Halewood – disliked about plans	A5.4 h)	(disliked) Poor existing retail provision and continued delays to the delivery of retail-led regeneration in Raven Court, Halewood centre	No	Noted. The Council remains committed to the delivery of this regeneration scheme, and supports ongoing onsite progress. It is expected that the scheme will be completed by late 2012.
Halewood – disliked about plans	A5.4 i)	(disliked) Poor existing facilities e.g. community centres and public transport links to larger centres and insufficient provision of infrastructure for new communities	No	Noted. The delivery of new and expanded communities in Halewood will be supported by infrastructure provision in line with policy CS27. Public transport links are dealt with under policy CS7. Detailed matters of transport access, and onsite infrastructure provision will be dealt with at the planning application stage for new residential development.
Halewood –	A5.4 j)	(disliked) Potential negative impacts of improving	No	Noted. The Council recognises that

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disliked about plans		access to existing greenspaces e.g. risk of anti-social behaviour		improvements to access to greenspaces must be balanced with improved surveillance and design in order that the greenspaces are available for the benefit of the whole community. This is recognised in policies CS19 and CS21.
Halewood – disliked about plans	A5.4 k)	(disliked) The feeling of relative neglect of Halewood compared to other areas of the Borough	No	Noted. The Halewood area does not contain one of the identified Principal Regeneration Areas within the Borough. However, the area has been subject to regeneration within its district centre, as well as selected regeneration of housing areas by registered providers such as KHT. Halewood also contains a significant existing housing allocation at Bridgefield Forum, as well as a Green Belt location for future housing development. All Borough-wide policies e.g. relating to design and the green environment will also apply in Halewood.
Huyton and Stockbridge Village – other comments	A6.2 a)	There is a need for provision of play equipment in the Alt area / Bluebell Estate	No	Noted. This issue is of a non-strategic nature and therefore has not been included within a Core Strategy policy, but the provision of play equipment will be considered as part of the Infrastructure Delivery Plan.

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Huyton and Stockbridge Village – other comments	A6.2 b)	There is a need for better public transport links to the new Leisure and Culture park	No	Noted. The need to provide a choice of methods of travel is integral to Policy CS7. The Council is also a key partner in the delivery of the Local Transport Plan, which seeks to deliver improved sustainable transport options across the Merseyside, led by Merseytravel. However the Council does not have direct control over commercial bus services.
Huyton and Stockbridge Village – other comments	A6.2 c)	The Council should support local police and enforce anti-social behaviour measures. The police should conduct further investigations into local drug use	No	Noted. The Core Strategy includes measures to tackle anti-social behaviour through the design and layout of new development. Issues relating to drug use are not relevant to the Core Strategy.
Huyton and Stockbridge Village – other comments	A6.2 d)	The subway at Huyton train station needs improvement	No	Noted. This is not included as a strategic transport scheme with policy CS8, nor in the Local Transport Plan or the Infrastructure Delivery Plan. Huyton will be subject to other rail improvements, notably arising as a result of the electrification of the line between Liverpool and Manchester.
Huyton and Stockbridge Village – other comments	A6.2 e)	More employment opportunities should be provided locally	No	Noted. This is a central aim of the Core Strategy, and is mentioned within the vision and strategic objectives, as well as within policy CS4.

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Huyton and Stockbridge Village – other comments	A6.2 f)	There is a need to bring the community back to Stockbridge Village	No	Noted. The creation of sustainable communities in existing residential areas is a central component of the Core Strategy. In particular, policy CS9 deals with the regeneration of Stockbridge Village, mentioning further residential development and provision of services as priorities.
Huyton and Stockbridge Village – other comments	A6.2 g)	Better public transport is needed, especially via Tarbock Road to Broadgreen hospital, and around Bowring Park	No	Noted. Maintaining an improved public transport system across Knowsley is a central component of policy CS7. The Council has no control over specific bus routes, and hence works with Merseytravel to seek to ensure that services provided meet Knowsley’s communities’ needs.
Huyton and Stockbridge Village – other comments	A6.2 h)	The electrification of the railway could mean the bridge at Bridge Road Roby might need to be dismantled	No	Noted. The Council remains supportive of the rail electrification and “Northern Hub” projects, which will improve rail connections from Huyton and Roby, including any infrastructure works required to support this.
Huyton and Stockbridge Village – other comments	A6.2 i)	There is a need for a One Stop Shop and community centre in Court Hey / Bowring Park and a better footpath to Childwall Valley Road doctors, post office and buses	No	The strategic need for and any plans for additional community facilities in Knowsley is considered as part of the Infrastructure Delivery Plan. The Council currently has no plans to extend its network of One Stop Shops to this location.

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Huyton and Stockbridge Village – other comments	A6.2 j)	Everything is great in L36, please leave it as it is	No	Noted and welcomed. The Council recognises that there are many positive features to the environment within the Huyton area, however changes must be made in order that the vision and objectives of the Core Strategy can be met, particularly when considering the longer term needs of planning up to 2028.
Huyton and Stockbridge Village – questions	A6.3 a)	What is happening to the old leisure centre in Huyton?	No	The former Huyton Leisure Centre site is considered surplus to leisure needs following the opening of the Knowsley Leisure and Culture Park and therefore its future land use remains subject to asset management consideration by the Council. In this regard, the suitability of the current land allocation will be reviewed at a subsequent stage of preparation of the Local Plan.
Huyton and Stockbridge Village – questions	A6.3 b)	Is the area appropriate for supported / affordable housing and housing for professionals?	No	The Council is seeking to create a balanced housing market within all areas of Knowsley, with a range of housing types, tenures and sizes. The Council has established through its evidence base the need to provide supported housing for Knowsley’s ageing population, as well as an improved offer of executive family homes.

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Huyton and Stockbridge Village – questions	A6.3 c)	What are the plans for the former Bowring Park school site?	No	The former Bowring Park school site is currently surplus to existing education requirements following the opening of the Centres for Learning within Huyton and therefore its future land use remains subject to asset management consideration by the Council. In this regard, the suitability of the current land allocation will be reviewed at a subsequent stage of preparation of the Local Plan.
Huyton and Stockbridge Village – questions	A6.3 d)	Why hasn't Bowring Park been refurbished yet?	No	The Council's priorities and programmes for investment in public open spaces are set out in the Green Space Strategy 2011 – 2014. To identify future priorities, the Council has also recently completed a Greenspace Audit focused on identification of localised quantity, quality and accessibility requirements.
Huyton and Stockbridge Village – questions	A6.3 e)	Have Liverpool residents and City Council been informed of plans for Edenhurst Avenue area?	No	As a neighbouring authority, Liverpool City Council is a statutory consultee for the Knowsley Core Strategy, and was notified of the consultation on the Preferred Options Report.
Kirkby – other comments	A6.4 a)	Better shopping facilities are needed in the Shevington Park area, including 24 hour shops and petrol stations	No	Noted. The provision of additional or improved retail facilities is considered as part of policy CS6. This includes the “town centres first” principle, which

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				seeks to direct appropriate levels of retail development to the Borough's town centres. Subsequent documents within the Local Plan will give more detailed policy guidance about the development of local centres.
Kirkby – other comments	A6.4 b)	Transport to and from surrounding communities is needed, particularly if people are going to visit Kirkby town centre development	No	Noted. The granted planning permission for the development of Kirkby town centre includes measures to improve public transport interchanges, and safeguard opportunities for the implementation of the Merseytram scheme. This is supported by the Local Transport Plan and policy CS8, as well as policy CS10.
Kirkby – other comments	A6.4 c)	There is a need for new magistrate court facilities in Kirkby	No	Noted. The provision of court facilities as community infrastructure in Knowsley is considered as part of the Infrastructure Delivery Plan. However, the issue of magistrate court provision is not critical to support new development and therefore is not specifically covered by the Core Strategy in assessing the Borough's development needs.
Kirkby – other comments	A6.4 d)	Opponents of new development are in a tiny minority – Kirkby has been denied investment and existing plans are welcomed	No	Noted and welcomed.

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Kirkby – other comments	A6.4 e)	Other companies (in addition to Tesco) should be encouraged to locate in Kirkby town centre	No	Noted. The planning permission for the regeneration of Kirkby town centre includes retail floorspace to be taken by additional occupiers to Tesco, ensuring a diverse range of retail facilities will be available to shoppers in the town centre. This is complemented by measures proposed to improve existing shopping areas, including Kirkby Market. Policies CS6 and CS10 also support this.
Kirkby – other comments	A6.4 f)	Open and green space should be preserved as far as possible, including at Westvale, Southdene and Field Lane	No	Noted. It is a priority of the Core Strategy to ensure provision of green and open space to meet the needs of Knowsley’s communities, including the residential communities of Kirkby. The approach to this is set out in policies CS8 and CS21, as informed by the Council’s detailed evidence base.
Kirkby – other comments	A6.4 g)	Traffic volumes on Cherryfield and Bewley Drive should be considered	No	Noted. Highways impacts of the regeneration of Kirkby town centre were considered as part of the planning application for the scheme. Policy CS10 also includes policy content relating to public transport, cycling, walking and other forms of access to the town centre, which are aimed at reducing congestion. The Council has also undertaken detailed studies

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				relating to transport infrastructure, which support the Core Strategy policies.
Kirkby – questions	A6.5 a)	What about Kirkby’s history i.e. St Chad’s Church and Millennium Green?	No	The Council is seeking to protect and enhance heritage assets around the Borough through policy CS20.
Kirkby – questions	A6.5 b)	Why are there no leisure facilities in the plans for Kirkby?	No	The decisions regarding leisure provision in Knowsley have been made in advance of the Core Strategy process.
Prescot, Whiston, Cronton and Knowsley Village – other comments	A6.6 a)	More sports grounds are required in Knowsley Village area	No	Noted. The provision of sports grounds are considered as part of the Council’s evidence base. The approach within Policy CS21 reflects this evidence.
Prescot, Whiston, Cronton and Knowsley Village – other comments	A6.6 b)	Facilities for activities are required, e.g. dancing, singing, sport; creating 'useable' green space for football, cricket, basketball, shooting, etc.	No	Noted. The provision of sports facilities is considered as part of the evidence base for the Core Strategy. The provision of outdoor sports facilities is considered within Policy CS21, while decisions about leisure and sport centre provision are outside of the scope of the Core Strategy, having already been made by the Council in advance of this process.
Prescot, Whiston,	A6.6 c)	More thought should be given to easily affordable life enhancing activities e.g. swimming for over 70s	No	Programmes within leisure centres are not within the scope of the policies of

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Cronton and Knowsley Village – other comments				the Core Strategy. However the Council's approach in the Core Strategy does seek to expand availability of leisure activities for all, in particular through the provision of green and open spaces.
Prescot, Whiston, Cronton and Knowsley Village – other comments	A6.6 d)	The Council should listen to what Prescot residents want, not what developers want	No	Noted. The Council has a statutory obligation as part of the preparation of the Core Strategy to listen to and account for the views of local people, as well as local stakeholders, developers and other partners. The Core Strategy has sought where possible to respond to issues raised. The planning process means that requests to changes to policy approaches are more likely when strong planning arguments are included within the views given, including those which relate to the relevant legislation and national planning policies. This is due to the process of plan preparation, which leads to Examination in Public by independent Planning Inspector.
Prescot, Whiston, Cronton and Knowsley	A6.6 e)	Prescot's town centre retail park has taken trade away from the town centre. It should be recognised that Prescot town centre and the retail park are separate entities	No	Noted. The Cables retail park is currently outside of the designated town centre area in Prescot. The Council considers that there would be

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Village – other comments				benefits in providing better linkages between the town centre and the retail park, joining up and consolidating the retail offer. These two areas have the potential to be complementary, as outlined in policy CS14.
Prescot, Whiston, Cronton and Knowsley Village – other comments	A6.6 f)	Traffic should be directed through Prescot town centre rather than around it	No	Noted. The Council will assess the suitability of future approaches to transport and traffic management / highway safety based upon evidence.
Prescot, Whiston, Cronton and Knowsley Village – other comments	A6.6 g)	Whiston is a village and not a town	No	The Council recognises that Whiston does not have a large town centre like Prescot, Huyton, etc. However, the settlement is a contiguous part of a large urbanised area, and hence cannot be considered as a village in the traditional sense (unlike Cronton, which is separated from other urban areas). Whiston village shopping area is considered a local centre in the Core Strategy retail hierarchy.
Prescot, Whiston, Cronton and Knowsley Village –	A6.6 h)	The children in Whiston are not able to access the same facilities as elsewhere e.g. leisure centre, public transport	No	Through the Core Strategy, the Council is seeking to provide equality of access to a range of facilities across the Borough. This is reflected in policy CS27 as well as in policy CS7 which

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other comments				relates to transport.
Prescot, Whiston, Cronton and Knowsley Village – other comments	A6.6 i)	Residents of Park Home retirement park moved there for peace and quiet and there is concern about surrounding them with houses	No	The broad Green Belt location identified to the South of Whiston is adjacent to the existing mobile home park. The Council notes the concerns of residents about impacts on amenity at this location. However, the Council’s evidence base indicates that this is one of the most suitable locations for future residential development within Knowsley, and therefore the location remains within policy CS5. Impacts on amenity will be dealt with through the subsequent stages of Local Plan preparation and through the planning application process.
Prescot, Whiston, Cronton and Knowsley Village – other comments	A6.6 j)	Suggestion that the waste ground by the roundabout at the end of Windy Arbor Road could be used as a development site	No	It is not clear which site is being referred to in this comment. The Council has considered a wide range of land within the urban area for housing development through its evidence base, including exercises which called for additional potential sites for residential development to be suggested.
Prescot, Whiston, Cronton and	A6.6 k)	The Council should work with the RSPB and Woodland Trust developing these urban areas (Whiston) beneficial to nature, including grass	No	Noted. The Council does clearly recognise the value of different areas of Knowsley in terms of their

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Knowsley Village – other comments		gardens rather than rockeries. The Council should take responsibility for the habitat they destroy		contribution to natural habitats. This is reflected in the vision and objectives of the Core Strategy, as well as within policies CS8 and CS21. Detailed design guidance will also be prepared through subsequent stages of the Local Plan documentation.
Prescot, Whiston, Cronton and Knowsley Village – other comments	A6.6 l)	There is a need for swimming pools, leisure centre, bowling centre, play facilities for the young children, and a cinema and new shops in Prescot	No	Noted. The Core Strategy accounts for infrastructure provision through policy CS27. Decisions regarding leisure centre provision and provision of play areas have been made by the Council in advance of the Core Strategy process. Unfortunately, direct influence over the investment plans of the private sector in providing cinemas, bowling and retail, remains outside of the remit of the Council. However, through policy CS14, the Council is seeking to encourage such investment within Prescot.
Prescot, Whiston, Cronton and Knowsley Village – other comments	A6.6 m)	Any development of land south of M62 would reduce the feel of Cronton as a village	No	The special character of Cronton Village is recognised with the Core Strategy. The Council has considered the impacts of the potential future development of the Green Belt location at Cronton Colliery (south of the M62) in terms of its impacts on the wider area, and it is considered to be

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				sufficiently far away to avoid any significant detrimental impact on the village. Detailed issues associated with impacts on amenity as a result of development at Cronton Colliery will be considered as part of the planning application process.
Prescot, Whiston, Cronton and Knowsley Village – other comments	A6.6 n)	Why is Cronton a part of Knowsley when villagers shop in Widnes and use Halton leisure facilities as it is more convenient	No	It is not within the remit of the Core Strategy to consider the appropriateness of existing Borough boundaries, which are set by the Boundary Commission. The relationship between Cronton and the nearby urban area of Widnes is however, noted.
Prescot, Whiston, Cronton and Knowsley Village – other comments	A6.6 o)	The creation of a park of the size of Richmond Park (London) would be a more positive move, and the opening up of the historic park and gardens to the public (Lord Derby Estate)	No	The Council has considered the provision of open space and parkland within Knowsley as part of the Core Strategy, and has assembled an evidence base which informs the appropriate levels of provision for different communities. This is balanced with the needs and requirements to plan for housing and employment growth. The Council has to recognise the primacy of landowner decisions in the use of their land; the Lord Derby Estate has made no indication of their wish to open up their land at Knowsley

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				Hall to the wider public.
Prescot, Whiston, Cronton and Knowsley Village – other comments	A6.6 p)	If the 1800 homes are built, a conservative estimate three cars per house, 5,400 cars in and out using Windy Arbour Road, Tarbock Roundabout or Rainhill roundabout	No	If the estimated number of dwellings are delivered within the broad Green Belt location to the south of Whiston, then it is recognised that the number of cars using the surrounding roads will necessarily increase. This is accounted for in the Council’s transportation evidence to support the Core Strategy. The Council contests the estimation that new houses would have three cars per household; information available to the Council indicates that currently within Knowsley there are approximately 0.8 cars per household. Therefore the traffic impact would be less than suggested in the response. The Council will deal with detailed matters associated with access and transport infrastructure as part of the planning application process.
Prescot, Whiston, Cronton and Knowsley Village – questions	A6.7 a)	What the Council are gaining by ruining the (Knowsley) Village?	No	It is not the Council’s intention to “ruin” Knowsley Village. It is recognised that there are concerns about the potential impact on the development of the broad Green Belt location at Knowsley Village on the wider area. However, the Council considers that negative impacts on the village can be mitigated

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				through the planning application process, including the application of the range of Core Strategy and other Local Plan policies to be adopted.
Prescot, Whiston, Cronton and Knowsley Village – questions	A6.7 b)	Where are the new leisure facilities and cinema promised for Prescot many years ago?	No	Decisions regarding leisure centre provision in Knowsley, including Prescot, have been made outside of the Core Strategy process. Investment in cinema provision is outside of the Council’s control, although through policy CS14, investment in Prescot town centre is encouraged.
Prescot, Whiston, Cronton and Knowsley Village – questions	A6.7 c)	Why is Whiston not included in regeneration plans?	No	Whiston is not designated as a Principal Regeneration Area within the Core Strategy, as its regeneration needs are not as great as some other areas of the Borough. However, Borough-wide policies relating to the new development will apply in Whiston.
Prescot, Whiston, Cronton and Knowsley Village – questions	A6.7 d)	If you go ahead and build the houses (at South Whiston) are you prepared to provide 24 hours round the clock security with cameras for Halsnead Park, plus constant uniformed patrols?	No	The security and policing of prospective housing developments is not specifically a matter for the Council, and no guarantee can be made that these services will be available or indeed necessary. However, the Council will ensure through the application of policy C19, supplementary guidance, and the planning application process, that the

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				design of new development will discourage antisocial behaviour and provide opportunities for natural surveillance.
Prescot, Whiston, Cronton and Knowsley Village – questions	A6.7 e)	Properties in Prescot and nearby areas lie empty - why encroach on a retirement park - and what will happen to nearby flora and fauna?	No	The Council recognises that there are homes which are empty within Knowsley. Some of these are empty to allow for turnover (e.g. houses awaiting sale), which is a sign of a healthy housing market. Some others have been on the market for a long time, reflecting the impacts of the economic recession on the housing market. Others still are long-term vacant, for a variety of reasons. However, Knowsley does not have a level of empty homes that is significantly higher than what would be expected. Therefore the Council does not consider this a major issue when planning for longer term housing growth. The Council recognises the value of local flora and fauna and these issues have been accounted for within the collation of the Council’s evidence base to support selection of locations for housing growth. These issues will also be addressed through policies CS8 and CS21, and the planning application

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				process.
Prescot, Whiston, Cronton and Knowsley Village – questions	A6.7 f)	Stadt Moers Park is a vast area, far too big. Why not use small suitable pockets of the 'Park Land' for housing development?	No	Through the collation of its evidence base for the Core Strategy, the Council considered the potential contribution that Stadt Moers Park (designated as Green Belt) could make in provision of land for future housing development. However, the area forms an essential gap between Huyton and Whiston / Prescot, and therefore fulfils one of the key objectives of the Green Belt. This means that it was not considered appropriate to identify any strategic sites within this area for housing development. The evidence collated suggested that a number of smaller sites could be used for development to “round off” the existing urban area, with limited detrimental impact to the essential gap. However, these sites were relatively small, and were still located within a Borough Park and in close proximity to environmental designations, and hence their contribution to housing delivery was minimal and they were discounted.
Halewood – other comments	A6.8 a)	High density development would bring congestion and less urban greenspace for Halewood	No	Noted. High density development would result in more densely populated areas, and hence additional pressure

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				on infrastructure provision, including the road network and urban greenspace provision. This is the rationale behind the strategy of selected urban expansion within Knowsley, with indicative appropriate densities for development in these areas. Within Halewood, the Council has recognised the value of urban greenspace through the provision of a strategic green link around the Halewood Triangle area.
Halewood – other comments	A6.8 b)	Calling on Halewood Town Council to reject plans for location of new residential development in areas of Green Belt	No	Knowsley Council cannot comment on Halewood Town Council’s position regarding this matter. This should be taken up with the Town Council directly.
Halewood – other comments	A6.8 c)	There are some positive instances of apartment developments in Halewood	No	Noted. The Council’s evidence base regarding housing needs and demands indicated that there is an ongoing role for flatted developments in rebalancing the housing market in Knowsley. Policy CS17 seeks to address this.
Halewood – other comments	A6.8 d)	Social housing already provided in Halewood seems very small with inadequate parking	No	Noted. Housing sizes and densities are considered within policies CS3 and CS17, although this relates to bedroom numbers and overall site densities rather than the floorspace size. This will be considered by the Council at the

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				planning application stage. The Council's adopted parking policy is outlined in the Ensuring a Choice of Travel SPD. This will be used to determine levels of parking appropriate for new residential development across Knowsley, including within Halewood.
Halewood – other comments	A6.8 e)	Problems parking at Halewood station, as well as access for disabled and those with mobility difficulties	No	Noted.
Halewood – other comments	A6.8 f)	People of Halewood are excluded from Knowsley. Kirkby and Huyton should not be given priority over Halewood	No	Noted. Through the Core Strategy, the Council is seeking to deliver the vision and strategic objectives for the future of Knowsley in all areas of the Borough. In accordance with the Council's evidence base, there are areas in Huyton and in Kirkby which are in greater need for regeneration and where opportunities exist to complete or deliver new regeneration programmes. Hence, Principal Regeneration Areas have been designated in these areas. However, a range of Borough-wide policies will apply to the other areas of the Borough, and reviews of the Core Strategy will consider whether regeneration efforts should be directed elsewhere during the plan period. It

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				should also be noted that the Core Strategy includes policies for housing growth in Halewood, which will necessarily bring infrastructure investment to the area.
Halewood – other comments	A6.8 g)	Halewood residents should pay less community charge (i.e. Council tax) due to the lack of facilities and shops in the area	No	It is not within the scope of the Core Strategy to consider setting Council Tax rates. The completion of the project to regenerate Halewood centre at Raven Court to include new retail facilities, complementing the existing health and leisure facilities in the area.
Halewood - questions	A6.9 a)	When will the completion of Raven Court centre regeneration occur?	No	The regeneration of Raven Court, including the provision of retail and transport facilities, is underway. It is expected to be completed by late 2012.
Halewood - questions	A6.9 b)	What are the plans for provision of community infrastructure e.g. police stations?	No	Community infrastructure such as policing facilities are included within the Infrastructure Delivery Plan and referred to in Policy CS27. Merseyside Police also operate their own estates strategies with regard to provision of station facilities.
Halewood - questions	A6.9 c)	Do disused railway lines (i.e. loop line) have potential for reinstatement?	No	The Core Strategy does not include any proposals for reinstatement of disused or abandoned railway lines in Knowsley, instead lending support to infrastructure projects which seek to improve and enhance existing railways

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				within the Borough, including line and station infrastructure.
Halewood - questions	A6.9 d)	What tenure will new houses in Halewood be, either private or rented?	No	The Council is seeking to deliver a mixture of new housing in Halewood, as in other areas of Knowsley. This will include an element of private market housing and of affordable housing (including social rented and intermediate models). The exact mix will not be known for individual sites until the planning application stage. Policy CS15 explains this in more detail.
Halewood - questions	A6.9 e)	Why there isn't an additional railway station on the West Coast Main Line between Liverpool South Parkway and Runcorn?	No	This would be an extremely significant and expensive infrastructure project. The need for an additional railway station has not been identified through consultation with both Network Rail and Merseytravel, and therefore has not been included within the Council's infrastructure plans in the Core Strategy.
Halewood - questions	A6.9 f)	Will proposals for cutting of housing benefits affect those living in their own houses and force them to move?	No	This issue is not relevant to the Core Strategy and is not within the scope of planning powers. The Council is however considering this issue more widely. Housing affordability in planning terms is considered as part of policy CS15.

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made?	Council Comments / Response
Green Belts	A6.10 a)	“Chipping away” at the Green Belt should not be allowed	No	Noted. The Council has collated a range of evidence which supports its position in looking to the Green Belt for additional sources of land to support housing and employment growth. The Council’s strategic approach should identify sufficient land for the longer term to the end of the plan period, and therefore is not considered to be “chipping away”.
Green Belts	A6.10 b)	There are lots of pieces of land and units lying around that should be used / refurbished rather than interfering with the Green Belt	No	Noted. The Council has considered the contribution to housing and employment growth from land within the urban area through its evidence base studies. Accounting for the potential for development of these, there is still a shortage of housing and employment land available for the longer term, hence the decision to look to contributions to land supply from the Green Belt.
Green Belts	A6.10 c)	The most important thing is to keep Green Belt land green	No	Noted. The Council intends to maintain the vast majority of Green Belt land in Knowsley. This is complemented by a wide range of Green Infrastructure within the urban areas of the Borough.
Green Belts	A6.10 d)	Question whether the Green Belt study has looked at the wider impacts of development e.g. on the flood plain, local habitats	No	The Green Belt study methodology includes a range of factors in scoring the potential broad locations for new

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				development, including flood risk and nature value. The Council has also commissioned some new evidence regarding flood risk to supplement this. In addition, these issues will be considered at the planning application stage of the future development of the broad locations identified in the Core Strategy.
Green Belts	A6.10 e)	Employ planners with environmental sympathy	No	The Council's qualified planners are trained in balancing environmental, social and economic considerations. All relevant national and European planning policy and regulations relating to environmental impact have been complied with, as demonstrated in the Sustainability Appraisals and Habitats Regulations Assessments which have accompanied plan preparation.
Green Belts	A6.10 f)	Why ruin Green Belt with houses nobody can afford? There is no shortage of houses for sale round Edenhurst	No	Housing affordability is a key concern for the Council, in accordance with the evidence base collated for the Core Strategy. This is over the long term plan period, reflecting fluctuating economic circumstances. The Council notes that there are properties currently for sale, and that these may be on the market for a longer period of time due to the wider housing market conditions.

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made?	Council Comments / Response
				The Council still considers it necessary to include Green Belt locations for future housing growth, in order to meet long term residential development needs, up to 2028.
Green Belts	A6.10 g)	Green Belt land (should be) owned by the people, not the Council, and should not be developed	No	Noted. The Council is not seeking to take ownership of the Green Belt locations proposed for future development. The onus will be on existing private landowners and developers to bring forward their plans for the locations to the Council. Through the Core Strategy, the Council is seeking to change the planning designation of such areas in the longer term, so that they can be developed for housing and employment uses, and will seek to work with private landowners to ensure that this is undertaken in the most appropriate way possible.
Green Belts	A6.10 h)	Does review the Green Belt mean reduce the Green Belt?	No	The process of review of the Green Belt undertaken as part of the Core Strategy will have an overall net impact of reducing the areas designated as Green Belt within Knowsley, as broad areas are identified as being suitable for longer term employment and housing growth. This is explained in more detail through policy CS5.

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				However, a very large proportion of land within Knowsley will remain within the Green Belt.
General	A6.11 a)	Sefton has brought together empty property owners with those needing flats or houses – could this method be employed in Knowsley?	No	Knowsley Council is aware of the steps being taken to address the issue of empty properties in Sefton. It should be noted that a much higher proportion of properties in Sefton are registered as empty, compared to those in Knowsley. The levels within Knowsley are indicative of a healthy housing market, of which temporary vacancy is a part. Knowsley Council also works with its partners to address bringing longer term empty properties back into use, particularly those which are problematic for local communities. However, the Council does not consider that the contribution from bringing empty homes back in to use could make a meaningful contribution to meeting housing needs within the Core Strategy plan period. This is particularly the case when considering the scale of need for new houses within Knowsley over the plan period. It should also be noted that in terms of monitoring housing growth, bringing disused homes back into use does not

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made?	Council Comments / Response
				count towards net delivery of new housing.
General	A6.11 b)	Who is going to pay for all these improvements? Now shoppers have to pay for parking, do we need more shops when markets and shops are already empty?	No	The Council has identified delivery mechanisms for the major policy actions across the Core Strategy. This includes both public and private sector investment. The Council is aware of town centre vacancy issues, and is seeking to address these through policy CS6 and town centre policies for Kirkby and Prescott (CS10 and CS14).
General	A6.11 c)	Knowsley has a high housing vacancy and repossession rate	No	Knowsley's housing vacancy rate is within the range of rates which are considered to represent a normal housing market turnover. The Council acknowledges that there are currently issues locally around housing repossession, but that these are attributable to a wide variety of factors, including employment, housing affordability and the wider housing market. The Council does not consider that these issues should alter its plans for longer term housing growth to meet housing needs and requirements in the future.
General	A6.11 d)	Where are all the young people going to go? They are the future	No	The Core Strategy is about planning for Knowsley's future, including Knowsley's communities. This is

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made?	Council Comments / Response
				reflected in the emphasis on planning for housing and employment growth, ensuring that young people have accommodation and jobs to support them throughout their lives.
General	A6.11 e)	That developers should be made to pay for planning consent, for provision of community facilities and infrastructure	No	Noted. Policy CS27 seeks to ensure that developers contribute to infrastructure provision needs arising from new development. This includes options for planning obligations (e.g. for open space) or for a planning obligations levy to be introduced at a later date. The setting of fees for consideration of planning applications is outside of the scope of the Core Strategy.
General	A6.11 f)	Disapproval is given to house builders making huge profits and then moving out of an area, leaving the burden of maintenance of infrastructure with the local authority	No	Noted. Infrastructure provision and maintenance is within the scope of the Core Strategy policy CS27. The Council is seeking to encourage through its planning policies a responsible attitude from developers with regard to supporting infrastructure for their developments.
General	A6.11 g)	Regeneration money has been squandered and would be better spent on provision of banks and food retail stores	No	The Council considers that its resources for regeneration have been directed to the most suitable areas, and the Core Strategy continues this, identifying six strategic opportunities for

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made?	Council Comments / Response
				regeneration throughout the Core Strategy plan period. The Council is not in the position to invest in banking services or retail, however, has through its past regeneration programmes e.g. in Stockbridge Village centre, sought to facilitate provision of such community facilities.
General	A6.11 h)	Demolition and rebuilding of existing estates would represent a better approach to provision of new housing	No	Noted. The Council recognises that demolition and rebuilding is a viable option for regeneration within some residential areas. This is particularly the case in areas which have proven to have high levels of vacancy or which could benefit from extensive remodelling (e.g. North Huyton area). However, the Council is planning for “net” housing growth, within which demolition replacements are not considered as extra dwellings.
General	A6.11 i)	Waste DPD allocations should be shown within the publication document (for Huyton and Kirkby)	No	The Core Strategy is a strategic document, and therefore individual site allocations are not shown. The Waste DPD site allocations will be shown on the Councils adopted proposals map once the Waste DPD is adopted. Links between the Waste DPD and the Knowsley Core Strategy are given within policy CS26.

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General	A6.11 j)	All of the jobs created should be for the people of Knowsley as employment is at an all time low in the area. Construction jobs should also go to local people rather than being outsourced	No	There are few planning mechanisms available to ensure that all new jobs created are taken by local people. However, the Council continues to work with partners including the JobCentre and Knowsley Works to deliver employment solutions for local businesses and local people.
General	A6.11 k)	There is no mention of new transport links except airport link road and cycle ways. Electric railways must be part of development plans	No	Although this issue was not emphasised to a great degree within the Summary Leaflet, policy CS7 specifically mentions the electrification of the railway line between Manchester and Liverpool, through Huyton and Roby. Support for the implementation of this project remains a priority for the Council. The Core Strategy also recognises the critical role of rail links from different parts of Knowsley to the wider city region.
General	A6.11 l)	The housing would give young families a chance to get on the housing ladder	No	Noted and welcomed. The Council through its approach to housing growth in the Core Strategy is seeking to provide a range of housing solutions for local people, including young families. This includes provision of affordable housing models such as shared ownership or rent-to-buy schemes (see policy CS15).

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General	A6.11 m)	If new housing is needed to meet council needs isn't it short sighted to remove facilities in the area, e.g. swimming baths, function suites, etc?	No	The Council is seeking to plan for housing growth alongside the provision of supporting infrastructure, in accordance with policy CS27. Decisions about leisure facilities have been taken in advance of and outside of the scope of the Core Strategy.
General	A6.11 n)	What about looking at setting up more allotment spaces, and also renewable energy for households that qualify and for council buildings?	No	Allotment provision is considered as part of the provision of greenspaces throughout the Borough under policy CS21. Renewable energy is considered under policies CS22 and CS23, including that new residential development be built to certain sustainability standards. The Council supports appropriate renewable technology provision in accordance with adopted planning policies.
General	A6.11 o)	Support is given to provision of affordable housing and shared ownership housing products	No	Noted and welcomed.
General	A6.11 p)	Older people without access to cars have been overlooked	No	The Council does not consider that this has been the case within the Core Strategy, given the focus on sustainable modes of transport including bus and rail, for example in CS7, and the role of accessible design, central to policy CS19. In addition, the Infrastructure Delivery Plan recognises the role of taxis and other services in

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				supporting traditional forms of transport.
General	A6.11 q)	Accommodation for those wishing to downsize must include two bedrooms, which are essential for accommodating families and carers	No	Noted. Policy CS17 indicates that only a limited number of one-bedroom properties are required in Knowsley, with a focus on provision of two-bedroom accommodation.
The consultation process	A6.12 a)	More details needed i.e. name affected areas by road names not North, South, East or West as the majority of people do not see themselves or associate where they live as compass points	No	Noted. The Summary Leaflet necessarily contained a limited level of detail compared to the Core Strategy Preferred Options Report. However, it is important to note that the Core Strategy is highly strategic in nature and therefore does not contain detail at the street level. This will be provided in subsequent Local Plan documents, which the Core Strategy has set the agenda for.
The consultation process	A6.12 b)	The Council have introduced parking fees in Huyton but feel justified in spending money on a consultation exercise	No	Noted. The Council's decision to publicise the Core Strategy consultation was taken in order that as many local people as possible be consulted on the statutory plans which will affect where they live. This decision was taken in isolation from decisions about other areas of Council activities, including the decision to charge for car parking in town centres.
The	A6.12 c)	Lack of information about the consultation event	No	The Council sought to advertise

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consultation process		means poor attendance at drop-in events		consultation events as widely as possible, including in the Summary Leaflet, online, in the local press and through social media outlets. Attendance at consultation events was good overall, and particularly high levels were recorded at weekend events e.g. in Prescot.
The consultation process	A6.12 d)	The provision of an advert in a local paper would represent better value for money than the production of a consultation leaflet	No	The Council did place a statutory press notice within the Liverpool Daily Post, and also advertises updates regarding Core Strategy progress within the free monthly Knowsley News magazine. The decision to distribute leaflets to all households through Royal Mail was taken in order that all residents were informed of the Preferred Options consultation, rather than just those who purchase a local paper.
The consultation process	A6.12 e)	There is scepticism about whether comments will be taken into account and feelings that the decisions about the plan have already been made	No	The Council has an obligation through the preparation of the Core Strategy to review and account for the issues raised by the consultation responses received. In addition, all responses made to the final stage of the Core Strategy will be forwarded to the Planning Inspector for consideration in the Examination in Public.
The	A6.12 f)	Welcome for the receipt of consultation materials	No	The Council has an obligation to

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consultation process		but the cost of production and distribution within the current financial climate is questioned		consult on its Core Strategy in accordance with the adopted Statement of Community Involvement, which incurs costs. However, these costs are considered appropriate given the need to ensure that local people and stakeholders are included in the plan preparation process.
The consultation process	A6.12 g)	Areas of Knowsley Village have not been informed about the consultation, except by neighbours	No	The Council sought to notify all residents about the Preferred Options consultation, including posting via Royal Mail, Summary Leaflets to each household. This was considered the most reliable method of distribution of materials, and was used alongside other methods of publicising the consultation, e.g. through Knowsley News and roadshow events.
The consultation process	A6.12 h)	The Council should circulate proposed plan with road names and exact locations of new housing before building starts	No	The Core Strategy is a strategic plan and hence does not include minute detail of road names and exact locations. Once the strategic policies are set, more detailed policies relating to specific areas will be considered as part of a subsequent site allocations document to be prepared by the Council.
The consultation	A6.12 i)	The Council did not ask the views of ordinary people	No	The Council sought to consult ordinary people through its leaflet consultation,

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process				within which leaflets were posted to all households within Knowsley. People were also invited to attend roadshow events, or use online facilities to get involved in the consultation. The Council has considered and responded to the views of residents, as demonstrated in this document, alongside a range of other stakeholders.
The consultation process	A6.12 j)	Why consult residents and then ignore the results of consultation?	No	The Council has a statutory obligation through the preparation of the Core Strategy to review and account for the issues raised by the consultation responses received. This document is demonstrative of this process. However, the Council does not have an obligation to make all of the changes suggested by consultees; the drafting of the final plan will involve balancing different views within the legislative framework for plan preparation.
The consultation process	A6.12 k)	Is the Council are trying to sneak plans in through the back door?	No	The plan preparation process for the Core Strategy is transparent and includes several statutory stages of consultation as well as Examination in Public; there is therefore no method by which the Council could “sneak” plans through to adoption. This document

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				demonstrates the Council's commitment to considering and responding to issues raised as part of consultation.
The consultation process	A6.12 I)	Did the Council not circulate leaflets to residents so that there was insufficient time to reply to the consultation?	No	The Council circulated summary leaflets via Royal Mail to all residents prior to the commencement of the Preferred Options consultation period, in order that there was sufficient time for residents to return consultation responses. The consultation period amounted to ten weeks, four weeks longer than the statutory minimum six weeks. In addition, roadshow events were held throughout the consultation period, raising awareness of the limited time available to get involved in the consultation.
Non-planning issues	A6.13 a)	More refuse bins, dog bins and dog walkers required	No	These detailed issues are not relevant to the strategic nature of the Core Strategy and therefore cannot be considered within its policy approaches.
Non-planning issues	A6.13 b)	Work is required at the Page Moss and Dinas Lane area	No	The strategy nature of the Core Strategy, identifies Principal Regeneration Areas but is not intended to restrict investment in other locations and has a consistent priorities for the whole of Knowsley relating to improved

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				housing choice, enhanced employment provision, retail and services, quality greenspaces, heritage assets and efficient sustainable transport.
Non-planning issues	A6.13 c)	Younger people in Huyton South should stop playing football close to people's houses	No	This detailed issue is not relevant to the strategic nature of the Core Strategy and therefore cannot be considered within its policy approaches.
Non-planning issues	A6.13 d)	Young children play area activities are not being considered at all due to the cut backs	No	The Council's priorities and programmes for investment in public open spaces are set out in the Green Space Strategy 2011 – 2014, including completion of the Play Pathfinder initiative relating to children's play areas. To identify future priorities, the Council has also recently completed a Greenspace Audit focused on identification of localised quantity, quality and accessibility requirements.
Non-planning issues	A6.13 e)	The police should control rowdiness of people leaving pubs	No	This detailed issue is not relevant to the strategic nature of the Core Strategy and therefore cannot be considered within its policy approaches.
Non-planning issues	A6.13 f)	Council should support fencing off of houses backing on to open green spaces, including St. Chad's, as anti-social behaviour is a local issue	No	This detailed issue is not relevant to the strategic nature of the Core Strategy and therefore cannot be considered within its policy

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				approaches. Individual proposals for development of this nature will necessarily be considered relative to local circumstances through the planning application process.
Non-planning issues	A6.13 g)	The Council continues to paint a depressing view of Kirkby, even when the town has produced many high achievers and sportsmen	No	Within the Core Strategy the Council does not seek to present a depressing view of Kirkby. The town's assets are identified, alongside the issues which the Core Strategy is trying to address through its policy approaches. This necessarily includes identifying issues around the need for regeneration in some of Kirkby's housing and employment areas.
Non-planning issues	A6.13 h)	Sonae should be closed as it is having negative health impacts on the current and future populations of Kirkby	No	This detailed issue is not relevant to the strategic nature of the Core Strategy and therefore cannot be considered within its policy approaches.
Non-planning issues	A6.13 i)	More control is needed to stop vandalism on Friday nights on South Avenue	No	This detailed issue is not relevant to the strategic nature of the Core Strategy and therefore cannot be considered within its policy approaches.
Non-planning issues	A6.13 j)	Local people can't afford to go to the Safari Park	No	This detailed issue is not relevant to the strategic nature of the Core Strategy and therefore cannot be considered within its policy

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				approaches.
Non-planning issues	A6.13 k)	Improved pavements and road surfaces are required	No	This detailed issue is not relevant to the strategic nature of the Core Strategy and therefore cannot be considered within its policy approaches.
Non-planning issues	A6.13 l)	The bus stop outside 'Rays' confectionary shop in Prescot should be moved for health and safety reasons including diesel emissions. Prescot bus station should be used as it is always empty	No	This detailed issue is not relevant to the strategic nature of the Core Strategy and therefore cannot be considered within its policy approaches.
Non-planning issues	A6.13 m)	There are road speed issues on Bridge Road in Roby	No	This detailed issue is not relevant to the strategic nature of the Core Strategy and therefore cannot be considered within its policy approaches.
Non-planning issues	A6.13 n)	There are too many speed bumps in Halewood, making driving uncomfortable and damaging cars	No	This detailed issue is not relevant to the strategic nature of the Core Strategy and therefore cannot be considered within its policy approaches.
Non-planning issues	A6.13 o)	There are local instances of speeding traffic in parts of Halewood	No	This detailed issue is not relevant to the strategic nature of the Core Strategy and therefore cannot be considered within its policy approaches.
Non-planning issues	A6.13 p)	It is hoped that there will be information about any change in transport (times, etc.) once Kirkby town centre has been redeveloped	No	The regeneration of Kirkby town centre will improve transport interchanges in the town. This is likely to have an

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				impact on timetables for buses etc, which are likely to be advertised locally, alongside revised published timetables in paper form and online. Merseytravel will be able to provide more information about this.
Non-planning issues	A6.13 q)	Lack of support for Future Schooling programme, including questioning whether this represents positive value for money for the Council	No	This detailed issue is not relevant to the strategic nature of the Core Strategy and therefore cannot be considered within its policy approaches.
Non-planning issues	A6.13 r)	Why there isn't a weekly market in Huyton as there is in Kirkby?	No	This detailed issue is not relevant to the strategic nature of the Core Strategy and therefore cannot be considered within its policy approaches.
Non-planning issues	A6.13 s)	Bring back the clock to Prescott Precinct as it is a beautiful feature	No	This detailed issue is not relevant to the strategic nature of the Core Strategy and therefore cannot be considered within its policy approaches.
Non-planning issues	A6.13 t)	The narrowest street in Europe (in Prescott) could be a tourist attraction	No	The potential for Prescott to capitalise on its unique heritage and further develop a visitor economy is highlighted in policy CS14 and also within policy CS20, which deals with Borough-wide heritage management.
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Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made?	Council Comments / Response
Overall thoughts – support	A2.2 a)	Over 60 responses to this question expressed general support for the proposals outlined within the leaflet.	No	Noted.
Overall thoughts – support	A2.2 b)	Aspects of the proposals which were particularly supported included: <ul style="list-style-type: none"> • Regeneration of Kirkby town centre • Provision of new houses including affordable housing 	No	Noted. These proposals are included in policies CS10 and CS15.
Overall thoughts – objection	A2.3 a)	Over 120 responses to this question expressed objections to the proposals set out in this leaflet	No	Noted.
Overall thoughts - objection	A2.3 b)	Aspects of the proposals which were particularly objected to included: <ul style="list-style-type: none"> • Proposed use of Green Belt land for housing / employment development, particularly in Whiston, Halewood and Huyton • The lack of progress with retail-led regeneration at Raven Court centre in Halewood • The current position of Prescot Town Centre 	No	Noted. The objection to the proposed use of Green Belt was widely voiced. However, the Council considers it necessary to continue with this policy approach in order that housing and employment needs can be met over the plan period and that the Council produces a sound plan for Knowsley. The Council remains committed to the regeneration of Halewood district centre (Raven Court), as indicated in the Core Strategy, and as demonstrated by work continuing on site. The Council is also aware of issues with Prescot Town Centre, as set out within the Core Strategy and its supporting materials. These are

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made?	Council Comments / Response
				addressed within Policy CS14.
Overall thoughts - Scepticism / confusion	A2.4 a)	Nearly 30 responses expressed scepticism about the proposals, and whether these could ever be delivered within Knowsley	No	Noted. Deliverability is a key element within the Core Strategy, and the Council is obliged to ensure that policy actions are deliverable over the plan period. This has to be balanced with efforts to meet the vision and objectives within the Core Strategy and to plan positively for the future.
Overall thoughts - Scepticism / confusion	A2.4 b)	A substantial number of respondents also expressed scepticism about the value of the consultation exercise, stating that they did not believe this represented a valuable exercise	No	Noted. The Council has a statutory obligation to account for and respond to the responses received through the consultation period (including the Preferred Options consultation). In addition, the Council's consultation methods are in accordance with its adopted Statement of Community Involvement.
Overall thoughts - Scepticism / confusion	A2.4 c)	Over 15 responses expressed confusion or a lack of understanding about the proposals and also questioned whether the level of detail set out within the leaflet was appropriate for the purposes of consultation	No	Noted. The Council recognises that the summary leaflet contained a limited version of the full Preferred Options Report and therefore was lacking in detail. It would not have been practical or cost effective to share the same quantity of a more detailed version with residents and partners. However, as stated in the leaflet and elsewhere in publicity materials, the full Report and its supporting materials were available

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				online and as paper copies in deposit locations around the Borough. The Council believes that through the leaflet, the correct balance was struck regarding the level of information available.
Non-planning issues	A2.5 a)	<p>Many respondents mentioned issues that were not directly relevant to the proposals set out within the leaflet. Popular issues included:</p> <ul style="list-style-type: none"> • Litter and the urban environment • Anti-social behaviour • Congestion and public transport services • The Council’s leisure strategy and previous decisions made about the location of leisure centres • A perceived monopoly of the retail market by some retailers 	No	It is noted that these issues are of concern to residents. However, these are service level issues (e.g. litter, ASB), previously made decisions (e.g. relating to leisure centres) or issues that the Council cannot control (e.g. a perceived prevalence of certain retailers). It is therefore not within the scope of the Core Strategy to address these issues.
Huyton and Stockbridge Village – Liked about plans	A4.1 a)	(liked) Recognition of local history and character	Yes	Noted. This is carried forward in Policy CS20. Increased emphasis has been added to the policy to focus on local heritage assets.
Huyton and Stockbridge Village – Liked about plans	A4.1 b)	(liked) Construction and completion of the new Leisure and Culture Park	No	Noted. This important infrastructure project has now been completed.
Kirkby – Liked about	A4.2 a)	(liked) That the plans may bring jobs for young people and currently unemployed in Kirkby	No	Noted. The aim of boosting employment levels and providing job

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plans				opportunities for local people is a central aim of the Core Strategy.
Kirkby – Liked about plans	A4.2 b)	(liked) Planned retail-led regeneration in Kirkby Town Centre	No	Noted. This is supported by an approved planning application, as well as within policies CS6 and CS10.
Kirkby – Liked about plans	A4.2 c)	(liked) Potential positive impact of drawing more families into the town due to improved residential offer, facilities and infrastructure	No	Noted. The plan aims to make Knowsley, including Kirkby, a sustainable and attractive place for families to live, both for existing residents and for new residents.
Kirkby – Liked about plans	A4.2 d)	(liked) Protection of Valley Road Corridor	No	Noted. The Valley Road Corridor is part of the strategic green link identified through the town of Kirkby as part of Policy CS8.
Prescot, Whiston, Cronton and Knowsley Village – Liked about plans	A4.3 a)	(liked) Capitalising on Prescot’s historic legacy and regenerating the town centre, including provision of better links to Cables retail park	No	Noted. Policies CS14 and CS20 seek to support this, through recognising the specific heritage value of Prescot, and the need to link the older centre around Eccleston Street to the newer retail facilities at Cables retail park.
Prescot, Whiston, Cronton and Knowsley Village – Liked about plans	A4.3 b)	(liked) Protecting and enhancing character of rural villages including Knowsley and Cronton	No	Noted. This policy approach remains central to the spatial strategy, and is also upheld through policy CS20, which seeks to manage the Borough’s heritage assets.
Prescot,	A4.3 c)	(liked) Provision of affordable housing options,	No	Noted. The need to provide affordable

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Whiston, Cronton and Knowsley Village – Liked about plans		particularly within areas which currently attract anti-social behaviour		housing has been clearly identified within the Council's evidence base, and is carried forward as an important policy in CS15.
Prescot, Whiston, Cronton and Knowsley Village – Liked about plans	A4.3 d)	(liked) Possibility of new jobs and businesses locating in the area	No	Noted. Encouraging business investment in this township area is included within the Core Strategy, including in policies relating to South Prescot and Prescot Town Centre.
Prescot, Whiston, Cronton and Knowsley Village – Liked about plans	A4.3 e)	(liked) Improving the quality of greenspaces around Whiston	No	Noted. Borough-wide greenspaces will be subject to the improvements outlined in policies CS8 and CS21.
Halewood – liked about plans	A4.4 a)	(liked) Delivering planned retail-led regeneration in Raven Court	No	Noted. The Council remains committed to this consented scheme, which is expected to be completed by the end of 2012.
Halewood – liked about plans	A4.4 b)	(liked) Improving quality and accessibility of green and open spaces, including Halewood triangle	No	Noted. Borough-wide greenspaces will be subject to the improvements outlined in policies CS8 and CS21. Halewood Triangle is identified as part of a strategic green link through the

Theme of Issue <i>(subtitle from ROC)</i>	ROC Para Ref	Summary of Issues Raised <i>(bullets taken from ROC)</i>	Changes made?	Council Comments / Response
				area in policy CS8.
Halewood – liked about plans	A4.4 c)	(liked) Recognition of the need for new jobs and housing, including affordable housing	No	Noted. The aims and objectives of the Core Strategy include the delivery of new jobs throughout the Borough, as well as a rebalancing of the housing market and a provision of additional affordable housing units.
Halewood – liked about plans	A4.4 d)	(liked) Opportunity to enhance connections between Halewood and Liverpool, including employment	Yes	Noted. The Council recognises through the Core Strategy that Halewood is located in close proximity to strategic employment areas in Liverpool. This is emphasised through the Council’s evidence base and also the approach to employment development set out in CS4.
Halewood – liked about plans	A4.4 e)	(liked) Focus on development of existing vacant brownfield sites e.g. Bridgefield Forum	No	Noted. There remains a commitment to the development of brownfield land within the urban area. Bridgefield forum is an allocated housing site within the Unitary Development Plan and its allocation for housing will remain under the Core Strategy policies.
Huyton and Stockbridge Village – disliked about plans	A5.1 a)	(disliked) Utilisation of land at Edenhurst Avenue and Knowsley Lane for new residential development, including concerns about traffic and environmental impacts, flood risk, community safety and impacts on houses prices	No	Locations within the Green Belt at Edenhurst Avenue and Knowsley Lane were chosen for future development in response to the evidence collected by the Council about the suitability of Green Belt sites to accommodate new housing and employment. Detailed

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				concerns about the development of these locations will be addressed by the Council through the planning application process.
Huyton and Stockbridge Village – disliked about plans	A5.1 b)	(disliked) Overlooking of the Bluebell Estate and the Roby areas within plans and proposals	No	Noted. The Core Strategy considers strategic development opportunities within the Borough, and hence these areas have not been specifically identified with individual policies. However, the Core Strategy contains blanket policies which cover all areas of the Borough, and seek to address issues like rebalancing the housing market and environmental improvements. In addition, subsequent plans within the Local Plan will include site allocations for local areas not addressed in the Core Strategy.
Huyton and Stockbridge Village – disliked about plans	A5.1 c)	(disliked) Lack of replacement of “Heatwaves” centre in Stockbridge Village and poor facilities for youth recreation	No	Decisions regarding the Council’s investment in leisure facilities in Stockbridge Village have been decided in advance of the Core Strategy. It is noted that poor facilities for youth recreation in this area is perceived to be an ongoing problem.
Huyton and Stockbridge Village – disliked	A5.1 d)	(disliked) Lack of plans for new shops and existing range of shops / facilities and vacancy in the town centre	No	Noted. The Core Strategy does not plan significant additional retail growth within Huyton or Stockbridge Village. Issues with diversifying the range of

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about plans				retail and other facilities within the town centres are dealt with under policy CS6, including addressing vacancy, to support more vibrant town centres.
Huyton and Stockbridge Village – disliked about plans	A5.1 e)	(disliked) Poor existing transport links for Huyton and Roby	No	Huyton and Roby benefit from rail, bus and road links to Liverpool City Centre, and to other centres such as Prescot, St.Helens and Manchester. Huyton and Roby will also benefit from the electrification of the rail line between Liverpool and Manchester. This and other transport network policies are set out in CS7.
Huyton and Stockbridge Village – disliked about plans	A5.1 f)	(disliked) The car parking charging scheme in Huyton town centre	No	Noted. Decisions regarding car parking charges are made outside of the Core Strategy process.
Huyton and Stockbridge Village – disliked about plans	A5.1 g)	(disliked) Apparent mismatch between residential regeneration and infrastructure provision e.g. in North Huyton	No	Noted. The Council is seeking to match new development with adequate supporting infrastructure, including at the plan level through the Infrastructure Delivery Plan process and as planning applications are considered by the Council.
Kirkby – disliked about plans	A5.2 a)	(disliked) Utilisation of land at Bank Lane, Kirkby for new residential development, including concerns about damage to local amenity, traffic increases and environmental impacts	No	The location within the Green Belt at Bank Lane was chosen for future development in response to the evidence collected by the Council

Theme of Issue (subtitle from ROC)	ROC Para Ref	Summary of Issues Raised (bullets taken from ROC)	Changes made?	Council Comments / Response
				about the suitability of Green Belt sites to accommodate new housing and employment. Concerns about the development of this location will be addressed by the Council through the planning application process.
Kirkby – disliked about plans	A5.2 b)	(disliked) Residential development should be private market housing, not social housing	No	The Council identified through its evidence base the need to rebalance the housing market in Knowsley, which included the construction of both market and affordable (social rented and intermediate) housing types. This approach is reflected in policy CS15.
Kirkby – disliked about plans	A5.2 c)	(disliked) New retail development in Kirkby town centre could undermine the existing shops and facilities	No	Noted. The redevelopment of Kirkby town centre is subject to a granted planning permission. The approach is a comprehensive one which serves to regenerate the whole town centre with a range of interventions. The Council believes that this approach will benefit the town centre as a whole, improving its vitality and viability, while addressing the established retail needs of the town.
Kirkby – disliked about plans	A5.2 d)	(disliked) Lack of good public transport links to Liverpool and other areas	No	Noted. Kirkby does benefit from rail and bus links to Liverpool and other areas; however the Council does recognise that these could be improved in the Core Strategy. The Council

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				continues to lend its support to the stalled Merseytram scheme which would connect Liverpool City Centre to Kirkby town centre. In addition, the Council works collaboratively with Merseytravel on transport planning matters including through the Local Transport Plan.
Kirkby – disliked about plans	A5.2 e)	(disliked) Lack of schemes to encourage reinvestment in employment areas or public transport facilities to service these areas	No	The Council would counter that investment in Kirkby’s employment areas is a high priority, particularly when considering the Knowsley Industrial Park Review and the implementation of its recommendations through policy CS22 and other policies. The measures outlined for KIP and the nearby Knowsley Business Park include road and public realm enhancements.
Kirkby – disliked about plans	A5.2 f)	(disliked) Potential loss of open and green spaces for new development	No	Noted. Sources of existing green and open space have been considered as potential provision of development land. However, the Council has also assembled evidence regarding which areas are currently in surplus and deficit of different kinds of open space. A balanced judgement has been made between the value of green and open space to communities, and the benefits

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				that new development and investment would bring. This is set out in policies CS8 and CS21.
Kirkby – disliked about plans	A5.2 g)	(disliked) Lack of detail about funding proposals for long term regeneration of employment areas	No	Delivery of long term regeneration in employment areas requires a combination of private and public investment relative to prevailing economic circumstances during the plan period. As the Core Strategy is strategic in nature, the detailed design and land uses in regeneration areas is not fixed at a site specific level, therefore funding sources and estimated values are subject to change meaning prescriptive details are not appropriate. The Council’s evidence does however include indicative costing for infrastructure requirements where necessary to facilitate structural remodelling and secure development investment in these areas.
Kirkby – disliked about plans	A5.2 h)	(disliked) Lack of proposals for new and improved sports and leisure facilities e.g. sports arena, ice rink, cinema	No	Decisions regarding the Council’s investment in leisure centres and sports facilities around Knowsley have been made in advance of the Core Strategy and therefore are outside of the scope of planning policy. Development in town centres, including leisure uses such as those mentioned,

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				is covered by policies CS4 and CS6, as well as those relating specifically to Kirkby and Prescott town centre regeneration.
Prescot, Whiston, Cronton and Knowsley Village – disliked about plans	A5.3 a)	(disliked) Utilisation of land at Knowsley Village for new residential development, including concerns that this may undermine the “village” atmosphere	No	Noted. The location within the Green Belt at Knowsley Village is reserved for longer term use. This location was chosen for future development in response to the evidence collected by the Council about the suitability of Green Belt sites to accommodate new housing and employment. Concerns about the development of the location will be addressed by the Council through the planning application process.
Prescot, Whiston, Cronton and Knowsley Village – disliked about plans	A5.3 b)	(disliked) Utilisation of land to the south of Whiston for new residential development, including concerns about potential impacts on traffic levels and the loss of environmental amenity, important habitats for flora and fauna and functional farm land	No	Noted. The location within the Green Belt to the South of Whiston has been chosen for future development in response to the evidence collected by the Council about the suitability of Green Belt sites to accommodate new housing and employment. Concerns about the development of this location will be addressed by the Council through the planning application process.
Prescot, Whiston,	A5.3 c)	(disliked) Utilisation of land at Cronton Colliery for employment uses including concerns that this	No	Noted. The location within the Green Belt at Cronton Colliery is reserved for

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Cronton and Knowsley Village – disliked about plans		should be left for nature conservation. Question whether brownfield sites should be used instead		longer term use. This location was chosen for future development in response to the evidence collected by the Council about the suitability of Green Belt sites to accommodate new employment development. Concerns about the development of the location will be addressed by the Council through the planning application process. It should be noted that although within the Green Belt, Cronton Colliery is actually a brownfield (previously developed site). The proposed use of this site for longer term employment uses is complemented by the promotion of existing available employment sites within the urban area of Knowsley, as set out in CS4.
Prescot, Whiston, Cronton and Knowsley Village – disliked about plans	A5.3 d)	(disliked) Apparent turnaround of 1995 decision to keep land to the South of Whiston within the Green Belt	No	Noted. The Council has to plan for development of the Borough up to 2028. The location within the Green Belt to the South of Whiston has been chosen for future development in response to the evidence collected by the Council about the suitability of Green Belt sites to accommodate new housing and employment. Concerns about the development of this location

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				will be addressed by the Council through the planning application process.
Prescot, Whiston, Cronton and Knowsley Village – disliked about plans	A5.3 e)	(disliked) That any new development at Halsnead area should include employment development to limit the number and length of journeys for local people	No	Noted. It is the Council’s intention that land to the South of the M62 at Cronton Colliery will be used in the longer term for employment use. There are also neighbouring employment locations at Huyton Business Park, and in South Liverpool, as well as opportunities presented by the excellent motorway links from the location. The development of this location presents opportunities for improved public transport links. This means that the area at Halsnead Park, which is reserved for residential development under policy CS5, will be well served by local employment opportunities.
Prescot, Whiston, Cronton and Knowsley Village – disliked about plans	A5.3 f)	(disliked) Lack of visible progress with footpath links from Whiston to Cronton	No	Noted. The Council acknowledges improvements to footpath links between Whiston and Cronton is strategically important and anticipated delivery is supported by identification as a strategic green link within the Key Diagram and within the area priorities.
Prescot, Whiston, Cronton and	A5.3 g)	(disliked) Lack of detailed focus on regeneration of Prescot Town Centre, including tackling town centre vacancy / unsuitable shops and dealing with the	No	The full Preferred Options Report included a detailed focus on this area, which was lacking within the Summary

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Knowsley Village – disliked about plans		negative impact of Cables retail park on the town centre		Leaflet. Among the priorities identified are to tackle town centre vacancy and to better link the older part of the town centre (i.e. Eccleston Street) with the newer part at Cables retail park. This approach is continued in Policy CS14.
Prescot, Whiston, Cronton and Knowsley Village – disliked about plans	A5.3 h)	(disliked) Lack of recognition of the impact of car parking charges on the viability of town centre regeneration	No	Noted. Decisions regarding parking charges in town centres have been made outside of the Core Strategy preparation process. These have been made across all town centres, and are in accordance with parking charges in nearby districts. Different elements of conditions that affect town centre viability are being monitored by the Council to assess their impacts.
Prescot, Whiston, Cronton and Knowsley Village – disliked about plans	A5.3 i)	(disliked) Lack of plans for new / replacement leisure facilities within Prescot and the need for new community infrastructure	No	Decisions regarding the Council’s investment in leisure centres and sports facilities around Knowsley have been made in advance of the Core Strategy and therefore are outside of the scope of planning policy. However, the wider scope of community infrastructure is considered as part of the Council’s infrastructure planning and also as part of policy CS27.
Prescot, Whiston, Cronton and	A5.3 j)	(disliked) Lack of plans for regeneration in Whiston	No	Noted. Whiston is not one of the Principal Regeneration Areas identified in the Core Strategy, as in comparison

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Knowsley Village – disliked about plans				to other areas of the Borough, there is little evidence that this area is in need of regeneration. However, the Core Strategy contains a number of Borough-wide policies to guide any development proposals outside of these specific regeneration areas.
Prescot, Whiston, Cronton and Knowsley Village – disliked about plans	A5.3 k)	(disliked) Lack of recognition of the unique character of the constituent parts of the area, and disagreement with grouping together areas under one title	No	The Prescot, Whiston, Cronton and Knowsley Village area is representative of one of the Area Partnership Boards (APBs) which cover Knowsley. Whilst it is recognised that this area is diverse in nature, there are also similarities between the settlements, including their historic character. These values are recognised by the Council through the Core Strategy policies which relate to this area.
Prescot, Whiston, Cronton and Knowsley Village – disliked about plans	A5.3 l)	(disliked) Questionable need for new houses when there are problems with selling empty houses in the existing market	No	Noted. The Council recognises that there are homes which are empty within Knowsley. Some of these are empty to allow for turnover (e.g. houses awaiting sale), which is a sign of a healthy housing market. Some others have been on the market for a long time, reflecting the impacts of the economic recession on the housing market. Others still are long-term vacant, for a variety of reasons.

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				However, Knowsley does not have a level of empty homes that is significantly higher than what would be expected under normal market conditions. Therefore the Council does not consider this a major issue when planning for longer term housing growth.
Halewood – disliked about plans	A5.4 a)	(disliked) Utilisation of land to the east of Halewood for new residential development, including impacts of enlargement of the settlement	No	Noted. The location within the Green Belt to the east of Halewood was chosen for future development in response to the evidence collected by the Council about the suitability of Green Belt sites to accommodate new development. It is recognised that the development of the location would enlarge the settlement at Halewood, however this would enable the Council to meet its long term housing needs and would be supported by relevant infrastructure. Other concerns about the development of the location will be addressed by the Council through the planning application process.
Halewood – disliked about plans	A5.4 b)	(disliked) Lack of information about the type / tenure / access to any new residential area to the east of Halewood	No	Noted. The Council has not provided any details of the potential housing developments that would be located to the east of Halewood. This is because the Core Strategy identifies broad

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				locations for Green Belt development only. The feasibility of access to such locations is provided within the Council’s transportation evidence, while broad indications of the types, tenures and sizes of housing the Council is seeking to provide during the plan period can be found in the Core Strategy’s housing policies, including CS15 and CS17.
Halewood – disliked about plans	A5.4 c)	(disliked) Questionable whether new houses built in Halewood would be attractive and would sell given existing housing market	No	Noted. The Council has had regard to current market conditions, but also needs to recognise that the Core Strategy covers an extended period to 2028, during which the housing market is likely to fluctuate several times. The Council understands that there is landowner and developer support for the inclusion of Green Belt land at Halewood in the housing supply.
Halewood – disliked about plans	A5.4 d)	(disliked) Concern that additional “private” housing schemes would be poorly integrated into the community	No	Noted. The Core Strategy’s housing policies seek to move away from poorly integrated private housing towards balanced and sustainable neighbourhoods, which feature a range of housing types, tenures and sizes.
Halewood – disliked about plans	A5.4 e)	(disliked) All existing greenspaces should be left for use for agriculture and wildlife and not be used for new development	No	Whilst the value of green and open spaces is recognised, the Council does not believe that this is a sustainable

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				position if targets for housing and employment growth are to be met. The Council will continue to seek to ensure that negative impacts on wildlife and agriculture are minimised. The Council has followed due process with regard to environmental and habitats appraisals through its plan preparation process, in addition to locally collated evidence regarding the value of existing open spaces.
Halewood – disliked about plans	A5.4 f)	(disliked) Potential negative impact on flooding and local flood plain caused by new development	No	Noted. The Council recognises that there are areas of Knowsley which are subject to different levels of flood risk and has collected an extensive evidence base in this regard. The Council does not believe that the policies of the Core Strategy will necessarily exacerbate these flood risk issues, and that mitigation measures can be taken to ensure that new development is not at risk of flooding, and does not place adjacent areas at similar risk. This position is supported by the policy measures outlined in CS24.
Halewood – disliked about plans	A5.4 g)	(disliked) Potential negative impacts of new residential communities taking jobs in local industry away from local people	No	Noted. The Council is planning for both employment and housing growth within the Core Strategy, meaning that both

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				homes and jobs will be provided over the plan period. However, it should be noted that Knowsley is located within a dynamic city region which is densely urbanised and with significant commuting patterns, for example with Liverpool City Centre. Where possible, the Council will seek to monitor trends of live-work areas and introduce measures to secure jobs for local people.
Halewood – disliked about plans	A5.4 h)	(disliked) Poor existing retail provision and continued delays to the delivery of retail-led regeneration in Raven Court, Halewood centre	No	Noted. The Council remains committed to the delivery of this regeneration scheme, and supports ongoing onsite progress. It is expected that the scheme will be completed by late 2012.
Halewood – disliked about plans	A5.4 i)	(disliked) Poor existing facilities e.g. community centres and public transport links to larger centres and insufficient provision of infrastructure for new communities	No	Noted. The delivery of new and expanded communities in Halewood will be supported by infrastructure provision in line with policy CS27. Public transport links are dealt with under policy CS7. Detailed matters of transport access, and onsite infrastructure provision will be dealt with at the planning application stage for new residential development.
Halewood – disliked about plans	A5.4 j)	(disliked) Potential negative impacts of improving access to existing greenspaces e.g. risk of anti-social behaviour	No	Noted. The Council recognises that improvements to access to greenspaces must be balanced with

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				improved surveillance and design in order that the greenspaces are available for the benefit of the whole community. This is recognised in policies CS19 and CS21.
Halewood – disliked about plans	A5.4 k)	(disliked) The feeling of relative neglect of Halewood compared to other areas of the Borough	No	Noted. The Halewood area does not contain one of the identified Principal Regeneration Areas within the Borough. However, the area has been subject to regeneration within its district centre, as well as selected regeneration of housing areas by registered providers such as KHT. Halewood also contains a significant existing housing allocation at Bridgefield Forum, as well as a Green Belt location for future housing development. All Borough-wide policies e.g. relating to design and the green environment will also apply in Halewood.
Huyton and Stockbridge Village – other comments	A6.2 a)	There is a need for provision of play equipment in the Alt area / Bluebell Estate	No	Noted. This issue is of a non-strategic nature and therefore has not been included within a Core Strategy policy, but the provision of play equipment will be considered as part of the Infrastructure Delivery Plan.
Huyton and Stockbridge	A6.2 b)	There is a need for better public transport links to the new Leisure and Culture park	No	Noted. The need to provide a choice of methods of travel is integral to Policy

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Village – other comments				CS7. The Council is also a key partner in the delivery of the Local Transport Plan, which seeks to deliver improved sustainable transport options across the Merseyside, led by Merseytravel. However the Council does not have direct control over commercial bus services.
Huyton and Stockbridge Village – other comments	A6.2 c)	The Council should support local police and enforce anti-social behaviour measures. The police should conduct further investigations into local drug use	No	Noted. The Core Strategy includes measures to tackle anti-social behaviour through the design and layout of new development. Issues relating to drug use are not relevant to the Core Strategy.
Huyton and Stockbridge Village – other comments	A6.2 d)	The subway at Huyton train station needs improvement	No	Noted. This is not included as a strategic transport scheme with policy CS8, nor in the Local Transport Plan or the Infrastructure Delivery Plan. Huyton will be subject to other rail improvements, notably arising as a result of the electrification of the line between Liverpool and Manchester.
Huyton and Stockbridge Village – other comments	A6.2 e)	More employment opportunities should be provided locally	No	Noted. This is a central aim of the Core Strategy, and is mentioned within the vision and strategic objectives, as well as within policy CS4.
Huyton and Stockbridge	A6.2 f)	There is a need to bring the community back to Stockbridge Village	No	Noted. The creation of sustainable communities in existing residential

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Village – other comments				areas is a central component of the Core Strategy. In particular, policy CS9 deals with the regeneration of Stockbridge Village, mentioning further residential development and provision of services as priorities.
Huyton and Stockbridge Village – other comments	A6.2 g)	Better public transport is needed, especially via Tarbock Road to Broadgreen hospital, and around Bowring Park	No	Noted. Maintaining an improved public transport system across Knowsley is a central component of policy CS7. The Council has no control over specific bus routes, and hence works with Merseytravel to seek to ensure that services provided meet Knowsley’s communities’ needs.
Huyton and Stockbridge Village – other comments	A6.2 h)	The electrification of the railway could mean the bridge at Bridge Road Roby might need to be dismantled	No	Noted. The Council remains supportive of the rail electrification and “Northern Hub” projects, which will improve rail connections from Huyton and Roby, including any infrastructure works required to support this.
Huyton and Stockbridge Village – other comments	A6.2 i)	There is a need for a One Stop Shop and community centre in Court Hey / Bowring Park and a better footpath to Childwall Valley Road doctors, post office and buses	No	The strategic need for and any plans for additional community facilities in Knowsley is considered as part of the Infrastructure Delivery Plan. The Council currently has no plans to extend its network of One Stop Shops to this location.
Huyton and Stockbridge	A6.2 j)	Everything is great in L36, please leave it as it is	No	Noted and welcomed. The Council recognises that there are many positive

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Village – other comments				features to the environment within the Huyton area, however changes must be made in order that the vision and objectives of the Core Strategy can be met, particularly when considering the longer term needs of planning up to 2028.
Huyton and Stockbridge Village – questions	A6.3 a)	What is happening to the old leisure centre in Huyton?	No	The former Huyton Leisure Centre site is considered surplus to leisure needs following the opening of the Knowsley Leisure and Culture Park and therefore its future land use remains subject to asset management consideration by the Council. In this regard, the suitability of the current land allocation will be reviewed at a subsequent stage of preparation of the Local Plan.
Huyton and Stockbridge Village – questions	A6.3 b)	Is the area appropriate for supported / affordable housing and housing for professionals?	No	The Council is seeking to create a balanced housing market within all areas of Knowsley, with a range of housing types, tenures and sizes. The Council has established through its evidence base the need to provide supported housing for Knowsley’s ageing population, as well as an improved offer of executive family homes.
Huyton and Stockbridge	A6.3 c)	What are the plans for the former Bowring Park school site?	No	The former Bowring Park school site is currently surplus to existing education

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Village – questions				requirements following the opening of the Centres for Learning within Huyton and therefore its future land use remains subject to asset management consideration by the Council. In this regard, the suitability of the current land allocation will be reviewed at a subsequent stage of preparation of the Local Plan.
Huyton and Stockbridge Village – questions	A6.3 d)	Why hasn't Bowring Park been refurbished yet?	No	The Council's priorities and programmes for investment in public open spaces are set out in the Green Space Strategy 2011 – 2014. To identify future priorities, the Council has also recently completed a Greenspace Audit focused on identification of localised quantity, quality and accessibility requirements.
Huyton and Stockbridge Village – questions	A6.3 e)	Have Liverpool residents and City Council been informed of plans for Edenhurst Avenue area?	No	As a neighbouring authority, Liverpool City Council is a statutory consultee for the Knowsley Core Strategy, and was notified of the consultation on the Preferred Options Report.
Kirkby – other comments	A6.4 a)	Better shopping facilities are needed in the Shevington Park area, including 24 hour shops and petrol stations	No	Noted. The provision of additional or improved retail facilities is considered as part of policy CS6. This includes the "town centres first" principle, which seeks to direct appropriate levels of retail development to the Borough's

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				town centres. Subsequent documents within the Local Plan will give more detailed policy guidance about the development of local centres.
Kirkby – other comments	A6.4 b)	Transport to and from surrounding communities is needed, particularly if people are going to visit Kirkby town centre development	No	Noted. The granted planning permission for the development of Kirkby town centre includes measures to improve public transport interchanges, and safeguard opportunities for the implementation of the Merseytram scheme. This is supported by the Local Transport Plan and policy CS8, as well as policy CS10.
Kirkby – other comments	A6.4 c)	There is a need for new magistrate court facilities in Kirkby	No	Noted. The provision of court facilities as community infrastructure in Knowsley is considered as part of the Infrastructure Delivery Plan. However, the issue of magistrate court provision is not critical to support new development and therefore is not specifically covered by the Core Strategy in assessing the Borough’s development needs.
Kirkby – other comments	A6.4 d)	Opponents of new development are in a tiny minority – Kirkby has been denied investment and existing plans are welcomed	No	Noted and welcomed.
Kirkby – other	A6.4 e)	Other companies (in addition to Tesco) should be encouraged to locate in Kirkby town centre	No	Noted. The planning permission for the regeneration of Kirkby town centre

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comments				includes retail floorspace to be taken by additional occupiers to Tesco, ensuring a diverse range of retail facilities will be available to shoppers in the town centre. This is complemented by measures proposed to improve existing shopping areas, including Kirkby Market. Policies CS6 and CS10 also support this.
Kirkby – other comments	A6.4 f)	Open and green space should be preserved as far as possible, including at Westvale, Southdene and Field Lane	No	Noted. It is a priority of the Core Strategy to ensure provision of green and open space to meet the needs of Knowsley’s communities, including the residential communities of Kirkby. The approach to this is set out in policies CS8 and CS21, as informed by the Council’s detailed evidence base.
Kirkby – other comments	A6.4 g)	Traffic volumes on Cherryfield and Bewley Drive should be considered	No	Noted. Highways impacts of the regeneration of Kirkby town centre were considered as part of the planning application for the scheme. Policy CS10 also includes policy content relating to public transport, cycling, walking and other forms of access to the town centre, which are aimed at reducing congestion. The Council has also undertaken detailed studies relating to transport infrastructure, which support the Core Strategy

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				policies.
Kirkby – questions	A6.5 a)	What about Kirkby’s history i.e. St Chad’s Church and Millennium Green?	No	The Council is seeking to protect and enhance heritage assets around the Borough through policy CS20.
Kirkby – questions	A6.5 b)	Why are there no leisure facilities in the plans for Kirkby?	No	The decisions regarding leisure provision in Knowsley have been made in advance of the Core Strategy process.
Prescot, Whiston, Cronton and Knowsley Village – other comments	A6.6 a)	More sports grounds are required in Knowsley Village area	No	Noted. The provision of sports grounds are considered as part of the Council’s evidence base. The approach within Policy CS21 reflects this evidence.
Prescot, Whiston, Cronton and Knowsley Village – other comments	A6.6 b)	Facilities for activities are required, e.g. dancing, singing, sport; creating 'useable' green space for football, cricket, basketball, shooting, etc.	No	Noted. The provision of sports facilities is considered as part of the evidence base for the Core Strategy. The provision of outdoor sports facilities is considered within Policy CS21, while decisions about leisure and sport centre provision are outside of the scope of the Core Strategy, having already been made by the Council in advance of this process.
Prescot, Whiston, Cronton and Knowsley	A6.6 c)	More thought should be given to easily affordable life enhancing activities e.g. swimming for over 70s	No	Programmes within leisure centres are not within the scope of the policies of the Core Strategy. However the Council’s approach in the Core

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Village – other comments				Strategy does seek to expand availability of leisure activities for all, in particular through the provision of green and open spaces.
Prescot, Whiston, Cronton and Knowsley Village – other comments	A6.6 d)	The Council should listen to what Prescot residents want, not what developers want	No	Noted. The Council has a statutory obligation as part of the preparation of the Core Strategy to listen to and account for the views of local people, as well as local stakeholders, developers and other partners. The Core Strategy has sought where possible to respond to issues raised. The planning process means that requests to changes to policy approaches are more likely when strong planning arguments are included within the views given, including those which relate to the relevant legislation and national planning policies. This is due to the process of plan preparation, which leads to Examination in Public by independent Planning Inspector.
Prescot, Whiston, Cronton and Knowsley Village – other	A6.6 e)	Prescot’s town centre retail park has taken trade away from the town centre. It should be recognised that Prescot town centre and the retail park are separate entities	No	Noted. The Cables retail park is currently outside of the designated town centre area in Prescot. The Council considers that there would be benefits in providing better linkages between the town centre and the retail

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comments				park, joining up and consolidating the retail offer. These two areas have the potential to be complementary, as outlined in policy CS14.
Prescot, Whiston, Cronton and Knowsley Village – other comments	A6.6 f)	Traffic should be directed through Prescot town centre rather than around it	No	Noted. The Council will assess the suitability of future approaches to transport and traffic management / highway safety based upon evidence.
Prescot, Whiston, Cronton and Knowsley Village – other comments	A6.6 g)	Whiston is a village and not a town	No	The Council recognises that Whiston does not have a large town centre like Prescot, Huyton, etc. However, the settlement is a contiguous part of a large urbanised area, and hence cannot be considered as a village in the traditional sense (unlike Cronton, which is separated from other urban areas). Whiston village shopping area is considered a local centre in the Core Strategy retail hierarchy.
Prescot, Whiston, Cronton and Knowsley Village – other comments	A6.6 h)	The children in Whiston are not able to access the same facilities as elsewhere e.g. leisure centre, public transport	No	Through the Core Strategy, the Council is seeking to provide equality of access to a range of facilities across the Borough. This is reflected in policy CS27 as well as in policy CS7 which relates to transport.

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Prescot, Whiston, Cronton and Knowsley Village – other comments	A6.6 i)	Residents of Park Home retirement park moved there for peace and quiet and there is concern about surrounding them with houses	No	The broad Green Belt location identified to the South of Whiston is adjacent to the existing mobile home park. The Council notes the concerns of residents about impacts on amenity at this location. However, the Council's evidence base indicates that this is one of the most suitable locations for future residential development within Knowsley, and therefore the location remains within policy CS5. Impacts on amenity will be dealt with through the subsequent stages of Local Plan preparation and through the planning application process.
Prescot, Whiston, Cronton and Knowsley Village – other comments	A6.6 j)	Suggestion that the waste ground by the roundabout at the end of Windy Arbor Road could be used as a development site	No	It is not clear which site is being referred to in this comment. The Council has considered a wide range of land within the urban area for housing development through its evidence base, including exercises which called for additional potential sites for residential development to be suggested.
Prescot, Whiston, Cronton and Knowsley Village –	A6.6 k)	The Council should work with the RSPB and Woodland Trust developing these urban areas (Whiston) beneficial to nature, including grass gardens rather than rockeries. The Council should take responsibility for the habitat they destroy	No	Noted. The Council does clearly recognise the value of different areas of Knowsley in terms of their contribution to natural habitats. This is reflected in the vision and objectives of

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other comments				the Core Strategy, as well as within policies CS8 and CS21. Detailed design guidance will also be prepared through subsequent stages of the Local Plan documentation.
Prescot, Whiston, Cronton and Knowsley Village – other comments	A6.6 l)	There is a need for swimming pools, leisure centre, bowling centre, play facilities for the young children, and a cinema and new shops in Prescot	No	Noted. The Core Strategy accounts for infrastructure provision through policy CS27. Decisions regarding leisure centre provision and provision of play areas have been made by the Council in advance of the Core Strategy process. Unfortunately, direct influence over the investment plans of the private sector in providing cinemas, bowling and retail, remains outside of the remit of the Council. However, through policy CS14, the Council is seeking to encourage such investment within Prescot.
Prescot, Whiston, Cronton and Knowsley Village – other comments	A6.6 m)	Any development of land south of M62 would reduce the feel of Cronton as a village	No	The special character of Cronton Village is recognised with the Core Strategy. The Council has considered the impacts of the potential future development of the Green Belt location at Cronton Colliery (south of the M62) in terms of its impacts on the wider area, and it is considered to be sufficiently far away to avoid any significant detrimental impact on the

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				village. Detailed issues associated with impacts on amenity as a result of development at Cronton Colliery will be considered as part of the planning application process.
Prescot, Whiston, Cronton and Knowsley Village – other comments	A6.6 n)	Why is Cronton a part of Knowsley when villagers shop in Widnes and use Halton leisure facilities as it is more convenient	No	It is not within the remit of the Core Strategy to consider the appropriateness of existing Borough boundaries, which are set by the Boundary Commission. The relationship between Cronton and the nearby urban area of Widnes is however, noted.
Prescot, Whiston, Cronton and Knowsley Village – other comments	A6.6 o)	The creation of a park of the size of Richmond Park (London) would be a more positive move, and the opening up of the historic park and gardens to the public (Lord Derby Estate)	No	The Council has considered the provision of open space and parkland within Knowsley as part of the Core Strategy, and has assembled an evidence base which informs the appropriate levels of provision for different communities. This is balanced with the needs and requirements to plan for housing and employment growth. The Council has to recognise the primacy of landowner decisions in the use of their land; the Lord Derby Estate has made no indication of their wish to open up their land at Knowsley Hall to the wider public.
Prescot,	A6.6 p)	If the 1800 homes are built, a conservative estimate	No	If the estimated number of dwellings

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Whiston, Cronton and Knowsley Village – other comments		three cars per house, 5,400 cars in and out using Windy Arbour Road, Tarbock Roundabout or Rainhill roundabout		are delivered within the broad Green Belt location to the south of Whiston, then it is recognised that the number of cars using the surrounding roads will necessarily increase. This is accounted for in the Council’s transportation evidence to support the Core Strategy. The Council contests the estimation that new houses would have three cars per household; information available to the Council indicates that currently within Knowsley there are approximately 0.8 cars per household. Therefore the traffic impact would be less than suggested in the response. The Council will deal with detailed matters associated with access and transport infrastructure as part of the planning application process.
Prescot, Whiston, Cronton and Knowsley Village – questions	A6.7 a)	What the Council are gaining by ruining the (Knowsley) Village?	No	It is not the Council’s intention to “ruin” Knowsley Village. It is recognised that there are concerns about the potential impact on the development of the broad Green Belt location at Knowsley Village on the wider area. However, the Council considers that negative impacts on the village can be mitigated through the planning application process, including the application of the

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				range of Core Strategy and other Local Plan policies to be adopted.
Prescot, Whiston, Cronton and Knowsley Village – questions	A6.7 b)	Where are the new leisure facilities and cinema promised for Prescot many years ago?	No	Decisions regarding leisure centre provision in Knowsley, including Prescot, have been made outside of the Core Strategy process. Investment in cinema provision is outside of the Council's control, although through policy CS14, investment in Prescot town centre is encouraged.
Prescot, Whiston, Cronton and Knowsley Village – questions	A6.7 c)	Why is Whiston not included in regeneration plans?	No	Whiston is not designated as a Principal Regeneration Area within the Core Strategy, as its regeneration needs are not as great as some other areas of the Borough. However, Borough-wide policies relating to the new development will apply in Whiston.
Prescot, Whiston, Cronton and Knowsley Village – questions	A6.7 d)	If you go ahead and build the houses (at South Whiston) are you prepared to provide 24 hours round the clock security with cameras for Halsnead Park, plus constant uniformed patrols?	No	The security and policing of prospective housing developments is not specifically a matter for the Council, and no guarantee can be made that these services will be available or indeed necessary. However, the Council will ensure through the application of policy C19, supplementary guidance, and the planning application process, that the design of new development will discourage antisocial behaviour and

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				provide opportunities for natural surveillance.
Prescot, Whiston, Cronton and Knowsley Village – questions	A6.7 e)	Properties in Prescot and nearby areas lie empty - why encroach on a retirement park - and what will happen to nearby flora and fauna?	No	The Council recognises that there are homes which are empty within Knowsley. Some of these are empty to allow for turnover (e.g. houses awaiting sale), which is a sign of a healthy housing market. Some others have been on the market for a long time, reflecting the impacts of the economic recession on the housing market. Others still are long-term vacant, for a variety of reasons. However, Knowsley does not have a level of empty homes that is significantly higher than what would be expected. Therefore the Council does not consider this a major issue when planning for longer term housing growth. The Council recognises the value of local flora and fauna and these issues have been accounted for within the collation of the Council’s evidence base to support selection of locations for housing growth. These issues will also be addressed through policies CS8 and CS21, and the planning application process.
Prescot,	A6.7 f)	Stadt Moers Park is a vast area, far too big. Why not	No	Through the collation of its evidence

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Whiston, Cronton and Knowsley Village – questions		use small suitable pockets of the 'Park Land' for housing development?		base for the Core Strategy, the Council considered the potential contribution that Stadt Moers Park (designated as Green Belt) could make in provision of land for future housing development. However, the area forms an essential gap between Huyton and Whiston / Prescott, and therefore fulfils one of the key objectives of the Green Belt. This means that it was not considered appropriate to identify any strategic sites within this area for housing development. The evidence collated suggested that a number of smaller sites could be used for development to “round off” the existing urban area, with limited detrimental impact to the essential gap. However, these sites were relatively small, and were still located within a Borough Park and in close proximity to environmental designations, and hence their contribution to housing delivery was minimal and they were discounted.
Halewood – other comments	A6.8 a)	High density development would bring congestion and less urban greenspace for Halewood	No	Noted. High density development would result in more densely populated areas, and hence additional pressure on infrastructure provision, including the road network and urban

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				greenspace provision. This is the rationale behind the strategy of selected urban expansion within Knowsley, with indicative appropriate densities for development in these areas. Within Halewood, the Council has recognised the value of urban greenspace through the provision of a strategic green link around the Halewood Triangle area.
Halewood – other comments	A6.8 b)	Calling on Halewood Town Council to reject plans for location of new residential development in areas of Green Belt	No	Knowsley Council cannot comment on Halewood Town Council’s position regarding this matter. This should be taken up with the Town Council directly.
Halewood – other comments	A6.8 c)	There are some positive instances of apartment developments in Halewood	No	Noted. The Council’s evidence base regarding housing needs and demands indicated that there is an ongoing role for flatted developments in rebalancing the housing market in Knowsley. Policy CS17 seeks to address this.
Halewood – other comments	A6.8 d)	Social housing already provided in Halewood seems very small with inadequate parking	No	Noted. Housing sizes and densities are considered within policies CS3 and CS17, although this relates to bedroom numbers and overall site densities rather than the floorspace size. This will be considered by the Council at the planning application stage. The Council’s adopted parking policy is

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				outlined in the Ensuring a Choice of Travel SPD. This will be used to determine levels of parking appropriate for new residential development across Knowsley, including within Halewood.
Halewood – other comments	A6.8 e)	Problems parking at Halewood station, as well as access for disabled and those with mobility difficulties	No	Noted.
Halewood – other comments	A6.8 f)	People of Halewood are excluded from Knowsley. Kirkby and Huyton should not be given priority over Halewood	No	Noted. Through the Core Strategy, the Council is seeking to deliver the vision and strategic objectives for the future of Knowsley in all areas of the Borough. In accordance with the Council's evidence base, there are areas in Huyton and in Kirkby which are in greater need for regeneration and where opportunities exist to complete or deliver new regeneration programmes. Hence, Principal Regeneration Areas have been designated in these areas. However, a range of Borough-wide policies will apply to the other areas of the Borough, and reviews of the Core Strategy will consider whether regeneration efforts should be directed elsewhere during the plan period. It should also be noted that the Core Strategy includes policies for housing

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				growth in Halewood, which will necessarily bring infrastructure investment to the area.
Halewood – other comments	A6.8 g)	Halewood residents should pay less community charge (i.e. Council tax) due to the lack of facilities and shops in the area	No	It is not within the scope of the Core Strategy to consider setting Council Tax rates. The completion of the project to regenerate Halewood centre at Raven Court to include new retail facilities, complementing the existing health and leisure facilities in the area.
Halewood - questions	A6.9 a)	When will the completion of Raven Court centre regeneration occur?	No	The regeneration of Raven Court, including the provision of retail and transport facilities, is underway. It is expected to be completed by late 2012.
Halewood - questions	A6.9 b)	What are the plans for provision of community infrastructure e.g. police stations?	No	Community infrastructure such as policing facilities are included within the Infrastructure Delivery Plan and referred to in Policy CS27. Merseyside Police also operate their own estates strategies with regard to provision of station facilities.
Halewood - questions	A6.9 c)	Do disused railway lines (i.e. loop line) have potential for reinstatement?	No	The Core Strategy does not include any proposals for reinstatement of disused or abandoned railway lines in Knowsley, instead lending support to infrastructure projects which seek to improve and enhance existing railways within the Borough, including line and station infrastructure.

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Halewood - questions	A6.9 d)	What tenure will new houses in Halewood be, either private or rented?	No	The Council is seeking to deliver a mixture of new housing in Halewood, as in other areas of Knowsley. This will include an element of private market housing and of affordable housing (including social rented and intermediate models). The exact mix will not be known for individual sites until the planning application stage. Policy CS15 explains this in more detail.
Halewood - questions	A6.9 e)	Why there isn't an additional railway station on the West Coast Main Line between Liverpool South Parkway and Runcorn?	No	This would be an extremely significant and expensive infrastructure project. The need for an additional railway station has not been identified through consultation with both Network Rail and Merseytravel, and therefore has not been included within the Council's infrastructure plans in the Core Strategy.
Halewood - questions	A6.9 f)	Will proposals for cutting of housing benefits affect those living in their own houses and force them to move?	No	This issue is not relevant to the Core Strategy and is not within the scope of planning powers. The Council is however considering this issue more widely. Provision of additional affordable housing options in Knowsley in planning terms is considered as part of policy CS15.
Green Belts	A6.10 a)	"Chipping away" at the Green Belt should not be	No	Noted. The Council has collated a

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		allowed		range of evidence which supports its position in looking to the Green Belt for additional sources of land to support housing and employment growth. The Council's strategic approach should identify sufficient land for the longer term to the end of the plan period, and therefore is not considered to be "chipping away".
Green Belts	A6.10 b)	There are lots of pieces of land and units lying around that should be used / refurbished rather than interfering with the Green Belt	No	Noted. The Council has considered the contribution to housing and employment growth from sites within the urban area through its evidence base studies. Accounting for the potential for development of these, there is still a shortage of housing and employment land available for the longer term, hence the decision to look to contributions to land supply from the Green Belt.
Green Belts	A6.10 c)	The most important thing is to keep Green Belt land green	No	Noted. The Council intends to maintain the vast majority of Green Belt land in Knowsley. This is complemented by a wide range of Green Infrastructure within the urban areas of the Borough.
Green Belts	A6.10 d)	Question whether the Green Belt study has looked at the wider impacts of development e.g. on the flood plain, local habitats	No	The Green Belt study methodology includes a range of factors in scoring the potential broad locations for new development, including flood risk and

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				nature value. The Council has also commissioned some new evidence regarding flood risk to supplement this. In addition, these issues will be considered at the planning application stage of the future development of the broad locations identified in the Core Strategy.
Green Belts	A6.10 e)	Employ planners with environmental sympathy	No	The Council's qualified planners are trained in balancing environmental, social and economic considerations. All relevant national and European planning policy and regulations relating to environmental impact have been complied with, as demonstrated in the Sustainability Appraisals and Habitats Regulations Assessments which have accompanied plan preparation.
Green Belts	A6.10 f)	Why ruin Green Belt with houses nobody can afford? There is no shortage of houses for sale round Edenhurst	No	Housing affordability is a key concern for the Council, in accordance with the evidence base collated for the Core Strategy. This is over the long term plan period, reflecting fluctuating economic circumstances. The Council notes that there are properties currently for sale, and that these may be on the market for a longer period of time due to the wider housing market conditions. The Council still considers it necessary

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				to include Green Belt locations for future housing growth, in order to meet long term residential development needs, up to 2028.
Green Belts	A6.10 g)	Green Belt land (should be) owned by the people, not the Council, and should not be developed	No	Noted. The Council is not seeking to take ownership of the Green Belt locations proposed for future development. The onus will be on existing private landowners and developers to bring forward their plans for the locations to the Council. Through the Core Strategy, the Council is seeking to change the planning designation of such areas in the longer term, so that they can be developed for housing and employment uses, and will seek to work with private landowners to ensure that this is undertaken in the most appropriate way possible.
Green Belts	A6.10 h)	Does review the Green Belt mean reduce the Green Belt?	No	The process of review of the Green Belt undertaken as part of the Core Strategy will have an overall net impact of reducing the areas designated as Green Belt within Knowsley, as broad areas are identified as being suitable for longer term employment and housing growth. This is explained in more detail through policy CS5. However, a very large proportion of

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				land within Knowsley will remain within the Green Belt.
General	A6.11 a)	Sefton has brought together empty property owners with those needing flats or houses – could this method be employed in Knowsley?	No	Knowsley Council is aware of the steps being taken to address the issue of empty properties in Sefton. It should be noted that a much higher proportion of properties in Sefton are registered as empty, compared to those in Knowsley. The levels within Knowsley are indicative of a healthy housing market, of which temporary vacancy is a part. Knowsley Council also works with its partners to address bringing longer term empty properties back into use, particularly those which are problematic for local communities. However, the Council does not consider that the contribution from bringing empty homes back in to use could make a meaningful contribution to meeting housing needs within the Core Strategy plan period. This is particularly the case when considering the scale of need for new houses within Knowsley over the plan period. It should also be noted that in terms of monitoring housing growth, bringing disused homes back into use does not count towards net delivery of new

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				housing.
General	A6.11 b)	Who is going to pay for all these improvements? Now shoppers have to pay for parking, do we need more shops when markets and shops are already empty?	No	The Council has identified delivery mechanisms for the major policy actions across the Core Strategy. This includes both public and private sector investment. The Council is aware of town centre vacancy issues, and is seeking to address these through policy CS6 and town centre policies for Kirkby and Prescott (CS10 and CS14).
General	A6.11 c)	Knowsley has a high housing vacancy and repossession rate	No	Knowsley's housing vacancy rate is within the range of rates which are considered to represent a normal housing market turnover. The Council acknowledges that there are currently issues locally around housing repossession, but that these are attributable to a wide variety of factors, including employment, housing affordability and the wider housing market. The Council does not consider that these issues should alter its plans for longer term housing growth to meet housing needs and requirements in the future.
General	A6.11 d)	Where are all the young people going to go? They are the future	No	The Core Strategy is about planning for Knowsley's future, including Knowsley's communities. This is reflected in the emphasis on planning

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				for housing and employment growth, ensuring that young people have accommodation and jobs to support them throughout their lives.
General	A6.11 e)	That developers should be made to pay for planning consent, for provision of community facilities and infrastructure	No	Noted. Policy CS27 seeks to ensure that developers contribute to infrastructure provision, where the need for such provision arises from new development. This includes options for developer contributions, in kind and financial contributions (e.g. for open space) or for a standard levy to be introduced at a later date. It is expected that the Council will produce additional planning policy documents to set out its detailed approach to this, drawing on a range of evidence. The setting of fees for consideration of planning applications is outside of the scope of the Core Strategy.
General	A6.11 f)	Disapproval is given to house builders making huge profits and then moving out of an area, leaving the burden of maintenance of infrastructure with the local authority	No	Noted. Infrastructure provision and maintenance is within the scope of the Core Strategy policy CS27. The Council is seeking to encourage through its planning policies a responsible attitude from developers with regard to supporting infrastructure for their developments. This will include the development of a developer

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				contributions system which will better reflect the impacts on infrastructure provision associated with new development.
General	A6.11 g)	Regeneration money has been squandered and would be better spent on provision of banks and food retail stores	No	The Council considers that its resources for regeneration have been directed to the most suitable areas, and the Core Strategy continues this, identifying six strategic areas of opportunity for regeneration throughout the Core Strategy plan period. The Council is not in the position to invest in banking services or retail, however, has through its past regeneration programmes e.g. in Stockbridge Village centre, sought to facilitate provision of such community facilities. This approach will continue in the Core Strategy.
General	A6.11 h)	Demolition and rebuilding of existing estates would represent a better approach to provision of new housing	No	Noted. The Council recognises that demolition and rebuilding is a viable option for regeneration within some residential areas. This is particularly the case in areas which have proven to have high levels of vacancy or which could benefit from extensive remodelling (e.g. North Huyton area). However, overall, the Council is planning for “net” housing growth over

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				the plan period, within which demolition replacements are not considered as extra dwellings. Demolition replacements which increased the overall number of homes would be appropriate in some areas, however in order to meet requirements for new housing, the Council has had to consider alternative strategies.
General	A6.11 i)	Waste DPD allocations should be shown within the publication document (for Huyton and Kirkby)	No	The Core Strategy is a strategic document, and therefore individual site allocations are not shown. The Waste DPD site allocations will be shown on the Councils adopted proposals map once the Waste DPD is adopted. Links between the Waste DPD and the Knowsley Core Strategy are given within policy CS26.
General	A6.11 j)	All of the jobs created should be for the people of Knowsley as employment is at an all time low in the area. Construction jobs should also go to local people rather than being outsourced	No	There are few planning mechanisms available to ensure that all new jobs created are taken by local people. However, more widely, the Council continues to work with partners including the JobCentre and Knowsley Works to deliver employment solutions for local businesses and local people.
General	A6.11 k)	There is no mention of new transport links except airport link road and cycle ways. Electric railways must be part of development plans	No	Although this issue was not emphasised to a great degree within the Summary Leaflet, policy CS7

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				specifically mentions the electrification of the railway line between Manchester and Liverpool, through Huyton and Roby. Support for the implementation of this project remains a priority for the Council. The Core Strategy also recognises the critical role of rail links from different parts of Knowsley to the wider city region.
General	A6.11 l)	The housing would give young families a chance to get on the housing ladder	No	Noted and welcomed. The Council through its approach to housing growth in the Core Strategy is seeking to provide a range of housing solutions for local people, including young families. This includes provision of affordable housing models such as shared ownership or rent-to-buy schemes (see policy CS15), which should also assist those struggling to enter the private housing market.
General	A6.11 m)	If new housing is needed to meet council needs isn't it short sighted to remove facilities in the area, e.g. swimming baths, function suites, etc.?	No	The Council is seeking to plan for housing growth alongside the provision of supporting infrastructure, in accordance with policy CS27. This is set out in more detail in the Infrastructure Delivery Plan which accompanies the Core Strategy. Decisions about leisure facilities have been taken in advance of and outside

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				of the scope of the Core Strategy.
General	A6.11 n)	What about looking at setting up more allotment spaces, and also renewable energy for households that qualify and for council buildings?	No	Allotment provision is considered as part of the provision of greenspaces throughout the Borough under policy CS21. Renewable energy is considered under policies CS22 and CS23, including that new residential development be built to certain sustainability standards. The Council supports appropriate renewable technology provision in accordance with adopted planning policies.
General	A6.11 o)	Support is given to provision of affordable housing and shared ownership housing products	No	Noted and welcomed.
General	A6.11 p)	Older people without access to cars have been overlooked	No	The Council does not consider that this has been the case within the Core Strategy, given the focus on sustainable modes of transport including bus and rail, for example in CS7, and the role of accessible design, central to policy CS19. In addition, the Infrastructure Delivery Plan recognises the role of taxis and other services in supporting traditional forms of transport. The Local Transport Plan also provides policy guidance for this matter.
General	A6.11 q)	Accommodation for those wishing to downsize must include two bedrooms, which are essential for	No	Noted. Policy CS17 indicates that only a limited number of one-bedroom

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		accommodating families and carers		properties are required in Knowsley, with a focus on provision of two-bedroom accommodation. It is expected that the market and Registered Providers will focus their provision on units of at least two bedrooms in size.
The consultation process	A6.12 a)	More details needed i.e. name affected areas by road names not North, South, East or West as the majority of people do not see themselves or associate where they live as compass points	No	Noted. The Summary Leaflet necessarily contained a limited level of detail compared to the Core Strategy Preferred Options Report. However, it is important to note that the Core Strategy is highly strategic in nature and therefore does not contain detail at the street level. This will be provided in subsequent Local Plan documents, which the Core Strategy will set the agenda for. The Council recognises that this approach may present difficulties for local people in understanding exactly where may be developed in the future, however all subsequent stages of plan preparation will be subject to consultation, in particular with those living in close proximity to areas to be designated for new development. In addition, neighbours to development sites will also be consulted at the planning

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				application stage.
The consultation process	A6.12 b)	The Council have introduced parking fees in Huyton but feel justified in spending money on a consultation exercise	No	Noted. The Council’s decision to publicise the Core Strategy consultation was taken in order that as many local people as possible be consulted on the statutory plans which will affect where they live. This is in accordance with the adopted Statement of Community Involvement, which sets the levels and methods of consultation to be used. This decision was taken in isolation from decisions about other areas of Council activities, including the decision to charge for car parking in town centres.
The consultation process	A6.12 c)	Lack of information about the consultation event means poor attendance at drop-in events	No	The Council sought to advertise consultation events as widely as possible, including in the Summary Leaflet, online, in the local press and through social media outlets. Attendance at consultation events was good overall, and particularly high levels were recorded at weekend events e.g. in Prescot town centre.
The consultation process	A6.12 d)	The provision of an advert in a local paper would represent better value for money than the production of a consultation leaflet	No	The Council did place a statutory press notice within the Liverpool Daily Post, and also advertised updates regarding Core Strategy progress within the free monthly Knowsley News magazine.

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				The decision to distribute leaflets to all households through Royal Mail was taken in order that all residents were informed of the Preferred Options consultation, rather than just those who purchase a local paper. The cost of placing a large advert in a local paper is also extremely significant, and for daily papers, has a very limited shelf life.
The consultation process	A6.12 e)	There is scepticism about whether comments will be taken into account and feelings that the decisions about the plan have already been made	No	The Council has an obligation through the preparation of the Core Strategy to review and account for the issues raised by the consultation responses received. In addition, all responses made to the final stage of the Core Strategy will be forwarded to the Planning Inspector for consideration in the Examination in Public.
The consultation process	A6.12 f)	Welcome for the receipt of consultation materials but the cost of production and distribution within the current financial climate is questioned	No	The Council has an obligation to consult on its Core Strategy in accordance with the adopted Statement of Community Involvement, which incurs costs. However, these costs are considered appropriate given the need to ensure that local people and stakeholders are included in the plan preparation process.
The	A6.12 g)	Areas of Knowsley Village have not been informed	No	The Council sought to notify all

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consultation process		about the consultation, except by neighbours		residents about the Preferred Options consultation, including posting via Royal Mail, Summary Leaflets to each household. This was considered the most reliable method of distribution of materials, and was used alongside other methods of publicising the consultation, e.g. through Knowsley News and roadshow events.
The consultation process	A6.12 h)	The Council should circulate proposed plan with road names and exact locations of new housing before building starts	No	The Core Strategy is a strategic plan and hence does not include minute detail of road names and exact locations. Once the strategic policies are set, more detailed policies relating to specific areas will be considered as part of a subsequent site allocations document to be prepared by the Council. In addition, at the planning application stage, neighbours to development sites will be consulted on detailed proposals, for example the location of new houses, layouts of roads, and provision of open spaces and planting on the development site.
The consultation process	A6.12 i)	The Council did not ask the views of ordinary people	No	The Council sought to consult ordinary people through its leaflet consultation, within which leaflets were posted to all households within Knowsley. People were also invited to attend roadshow

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				events, or use online facilities to get involved in the consultation. The Council has considered and responded to the views of residents, as demonstrated in this document, alongside a range of other stakeholders.
The consultation process	A6.12 j)	Why consult residents and then ignore the results of consultation?	No	The Council has a statutory obligation through the preparation of the Core Strategy to review and account for the issues raised by the consultation responses received. This document is demonstrative of this process. However, the Council does not have an obligation to make all of the changes suggested by consultees; the drafting of the final plan will involve balancing different views within the legislative framework for plan preparation.
The consultation process	A6.12 k)	Is the Council are trying to sneak plans in through the back door?	No	The plan preparation process for the Core Strategy is transparent and includes several statutory stages of consultation as well as an independent and transparent Examination in Public; there is therefore no method by which the Council could “sneak” plans through to adoption. This document demonstrates the Council’s commitment to considering and

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				responding to issues raised as part of consultation.
The consultation process	A6.12 l)	Did the Council not circulate leaflets to residents so that there was insufficient time to reply to the consultation?	No	The Council circulated summary leaflets via Royal Mail to all residents prior to the commencement of the Preferred Options consultation period, in order that there was sufficient time for residents to return consultation responses. The consultation period amounted to ten weeks, four weeks longer than the statutory minimum six weeks. In addition, roadshow events were held throughout the consultation period, raising awareness of the limited time available to get involved in the consultation. It has been the Council's aim to involve as many local people as possible in the consultation on the Core Strategy.
Non-planning issues	A6.13 a)	More refuse bins, dog bins and dog walkers required	No	These detailed issues are not relevant to the strategic nature of the Core Strategy and therefore cannot be considered within its policy approaches.
Non-planning issues	A6.13 b)	Work is required at the Page Moss and Dinas Lane area	No	The strategy nature of the Core Strategy, identifies Principal Regeneration Areas but is not intended to restrict investment in other locations and has a consistent priorities for the

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				whole of Knowsley relating to improved housing choice, enhanced employment provision, retail and services, quality greenspaces, heritage assets and efficient sustainable transport.
Non-planning issues	A6.13 c)	Younger people in Huyton South should stop playing football close to people's houses	No	This detailed issue is not relevant to the strategic nature of the Core Strategy and therefore cannot be considered within its policy approaches.
Non-planning issues	A6.13 d)	Young children play area activities are not being considered at all due to the cut backs	No	The Council's priorities and programmes for investment in public open spaces are set out in the Green Space Strategy 2011 – 2014, including completion of the Play Pathfinder initiative relating to children's play areas. To identify future priorities, the Council has also recently completed a Greenspace Audit focused on identification of localised quantity, quality and accessibility requirements.
Non-planning issues	A6.13 e)	The police should control rowdiness of people leaving pubs	No	This detailed issue is not relevant to the strategic nature of the Core Strategy and therefore cannot be considered within its policy approaches.
Non-planning issues	A6.13 f)	Council should support fencing off of houses backing on to open green spaces, including St. Chad's, as anti-social behaviour is a local issue	No	This detailed issue is not relevant to the strategic nature of the Core Strategy and therefore cannot be

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				considered within its policy approaches. Individual proposals for development of this nature will necessarily be considered relative to local circumstances through the planning application process.
Non-planning issues	A6.13 g)	The Council continues to paint a depressing view of Kirkby, even when the town has produced many high achievers and sportsmen	No	Within the Core Strategy the Council does not seek to present a depressing view of Kirkby. The town’s assets are identified, alongside the issues which the Core Strategy is trying to address through its policy approaches. This necessarily includes identifying issues around the need for regeneration in some of Kirkby’s housing and employment areas.
Non-planning issues	A6.13 h)	Sonae should be closed as it is having negative health impacts on the current and future populations of Kirkby	No	This detailed issue is not relevant to the strategic nature of the Core Strategy and therefore cannot be considered within its policy approaches.
Non-planning issues	A6.13 i)	More control is needed to stop vandalism on Friday nights on South Avenue	No	This detailed issue is not relevant to the strategic nature of the Core Strategy and therefore cannot be considered within its policy approaches.
Non-planning issues	A6.13 j)	Local people can’t afford to go to the Safari Park	No	This detailed issue is not relevant to the strategic nature of the Core Strategy and therefore cannot be

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				considered within its policy approaches.
Non-planning issues	A6.13 k)	Improved pavements and road surfaces are required	No	This detailed issue is not relevant to the strategic nature of the Core Strategy and therefore cannot be considered within its policy approaches.
Non-planning issues	A6.13 l)	The bus stop outside 'Rays' confectionary shop in Prescot should be moved for health and safety reasons including diesel emissions. Prescot bus station should be used as it is always empty	No	This detailed issue is not relevant to the strategic nature of the Core Strategy and therefore cannot be considered within its policy approaches. The provision of public transport facilities in Prescot town centre will be considered as part of Core Strategy policy CS14.
Non-planning issues	A6.13 m)	There are road speed issues on Bridge Road in Roby	No	This detailed issue is not relevant to the strategic nature of the Core Strategy and therefore cannot be considered within its policy approaches.
Non-planning issues	A6.13 n)	There are too many speed bumps in Halewood, making driving uncomfortable and damaging cars	No	This detailed issue is not relevant to the strategic nature of the Core Strategy and therefore cannot be considered within its policy approaches.
Non-planning issues	A6.13 o)	There are local instances of speeding traffic in parts of Halewood	No	This detailed issue is not relevant to the strategic nature of the Core Strategy and therefore cannot be considered within its policy

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				approaches.
Non-planning issues	A6.13 p)	It is hoped that there will be information about any change in transport (times, etc.) once Kirkby town centre has been redeveloped	No	The regeneration of Kirkby town centre will improve transport interchanges in the town. This is likely to have an impact on timetables for buses, etc., which are likely to be advertised locally, alongside revised published timetables in paper form and online. Merseytravel will be able to provide more information about this.
Non-planning issues	A6.13 q)	Lack of support for Future Schooling programme, including questioning whether this represents positive value for money for the Council	No	This detailed issue is not relevant to the strategic nature of the Core Strategy and therefore cannot be considered within its policy approaches.
Non-planning issues	A6.13 r)	Why there isn't a weekly market in Huyton as there is in Kirkby?	No	This detailed issue is not relevant to the strategic nature of the Core Strategy and therefore cannot be considered within its policy approaches.
Non-planning issues	A6.13 s)	Bring back the clock to Prescott Precinct as it is a beautiful feature	No	This detailed issue is not relevant to the strategic nature of the Core Strategy and therefore cannot be considered within its policy approaches.
Non-planning issues	A6.13 t)	The narrowest street in Europe (in Prescott) could be a tourist attraction	No	The potential for Prescott to capitalise on its unique heritage and further develop a visitor economy is highlighted in policy CS14 and also

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				within policy CS20, which deals with Borough-wide heritage management.

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